

## **EXHIBIT B: BILLING RECORDS**

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

August 8, 2018

**Attention:**

File #: 43121-002

Inv #: 26396

**RE:** MCAD - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jul-13-18	Draft MCAD Charge (2.2); conference with client re: same and strategy (.6).	BW	2.80	1,260.00	PJH
Jul-16-18	Draft MCAD Charge.	BW	1.10	495.00	PJH
Jul-20-18	Draft MCAD Charge.	BW	1.60	720.00	PJH
Jul-21-18	Draft MCAD Charge.	BW	3.50	1,575.00	PJH
Jul-26-18	Finalize MCAD Charge (.2); conference with client re: same (.2).	BW	0.40	180.00	PJH
Jul-27-18	Revise and finalize Charge (1.2); file same (.2); conference with client re: same (.4).	BW	1.80	810.00	PJH
	Totals		11.20	\$5,040.00	
PJH	Total Hrs Billed 11.20	Rate \$450.00	Total Fees	\$5,040.00	
<b>Total Fee &amp; Disbursements</b>				<b>\$5,040.00</b>	

**Balance Now Due**

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**\$5,040.00**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

September 10, 2018

**Attention:**

File #: 43121-002

Inv #: 26554

**RE:** MCAD - Pharmaceutical Product Development

<b>DATE</b>	<b>DESCRIPTION</b>		<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
Aug-09-18	Conference with opposing counsel re: settlement (.4); conference with client re: same (.2).	BW	0.60	270.00	PJH
Aug-13-18	Draft email to opposing counsel re: possible mediation (.2); conference with client re: same (.2).	BW	0.40	180.00	PJH
Aug-21-18	Conference with client re: settlement strategy.	BW	0.20	90.00	PJH
Aug-24-18	Draft email to opposing counsel re: settlement.	BW	0.20	90.00	PJH
Aug-30-18	Conference with client re: status.	BW	0.20	90.00	PJH
Totals			1.60	\$720.00	
PJH	<b>Total Hrs Billed</b> 1.60	<b>Rate</b> \$450.00	<b>Total Fees</b> \$720.00		

**DISBURSEMENTS**

(Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Totals	\$47.50
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<b>Total Fee &amp; Disbursements</b>	<b>\$767.50</b>
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<b>Balance Now Due</b>	<b>\$767.50</b>
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

October 4, 2018

**Attention:**

File #: 43121-002

Inv #: 26622

**RE:** MCAD - Pharmaceutical Product Development

<b>DATE</b>	<b>DESCRIPTION</b>		<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
Sep-07-18	Attention to emails re: mediation scheduling (.2); conference with client re: same and strategy (.5).	BW	0.70	315.00	PJH
Sep-10-18	Attention to email re: mediation.	BW	0.10	45.00	PJH
Sep-14-18	Attention to emails re: mediation scheduling.	BW	0.30	135.00	PJH
Sep-18-18	Attention to mediation scheduling.	BW	0.30	135.00	PJH
Sep-26-18	Conference with client re: status and strategy (.7); attention to mediation scheduling (.4).	BW	1.10	495.00	PJH
	Totals		2.50	\$1,125.00	
PJH	<b>Total Hrs Billed</b> 2.50	<b>Rate</b> \$450.00	<b>Total Fees</b>	\$1,125.00	
<b>Total Fee &amp; Disbursements</b>					<b>\$1,125.00</b>

**Balance Now Due**

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**\$1,125.00**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

November 8, 2018

**Attention:**

File #: 43121-002

Inv #: 26804

**RE:** MCAD - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Oct-02-18	Attention to mediation scheduling.	BW	0.30	135.00	PJH
Oct-04-18	Conference with client re: mediation preparation.	BW	1.50	675.00	PJH
Oct-10-18	Draft and revise mediation statement (1.5); conference with Judge Hinkle and opposing counsel (.5); email to Judge Hinkle and opposing counsel with additional documentation concerning compensation (.6).	BW	2.60	1,170.00	PJH
	Conference with client re: mediation (.4); begin drafting mediation statement (1.4).	BW	1.80	810.00	PJH
Oct-11-18	Attend mediation.	BW	8.50	3,825.00	PJH
Oct-16-18	Emails to/from client re: confidentiality issues.	BW	0.20	90.00	PJH
Oct-17-18	Conference with client re: status and strategy.	BW	0.50	225.00	PJH



Totals	15.40	\$6,930.00
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PJH	Total Hrs Billed 15.40	Rate \$450.00	Total Fees \$6,930.00
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Oct-10-18	Mediation Fee	3,000.00
Nov-06-18	Courier Services JAMS	15.00

Totals	\$3,015.00
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Total Fee & Disbursements	\$9,945.00
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Balance Now Due	\$9,945.00
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TAX ID Number 13-4299300

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Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

December 11, 2018

**Attention:**

File #: 43121-002

Inv #: 26938

**RE:** MCAD - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Nov-09-18	Review position statement (.3); email to client re: same (.1).	BW	0.40	180.00	PJH
Nov-12-18	Draft proposed email to Chad.	BW	0.20	90.00	PJH
Nov-15-18	Conference with client re: status and strategy.	BW	1.20	540.00	PJH
Nov-16-18	Conference with MCAD re: investigatory conference.	BW	0.10	45.00	PJH
Nov-21-18	Conference with client re: status and strategy.	BW	0.30	135.00	PJH
Nov-27-18	Comment on email response to Chad (.5); attention to draft submission by Dr. K (.2).	BW	0.70	315.00	PJH

Totals

2.90      \$1,305.00

PJH	Total Hrs Billed	2.90	Rate	\$450.00	Total Fees	\$1,305.00
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**Total Fee & Disbursements****\$1,305.00**

**Balance Now Due**

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**\$1,305.00**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

February 12, 2019

**Attention:**

File #: 43121-002

Inv #: 27167

**RE:** MCAD - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jan-09-19	Review/analyze position statement (1.5); brief research in connection with same (.4).	BW	1.90	855.00	PJH
Jan-10-19	Conference with client re: rebuttal (.9); draft same (2.7).	BW	3.60	1,620.00	PJH
Jan-11-19	Draft rebuttal (3.3); draft email to PPD (.2); conference with client re: same (.4).	BW	3.90	1,755.00	PJH
Jan-17-19	Draft rebuttal.	BW	2.20	990.00	PJH
Jan-18-19	Draft rebuttal.	BW	1.60	720.00	PJH
Jan-31-19	Revise MCAD rebuttal (.8); conference with client re: status, strategy and next steps (.4).	BW	1.20	540.00	PJH

Totals

14.40      \$6,480.00

PJH	Total Hrs Billed	14.40	Rate	\$450.00	Total Fees	\$6,480.00
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**Total Fee & Disbursements****\$6,480.00**

<b>Balance Now Due</b>	<hr/> \$6,480.00
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***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

March 7, 2019

**Attention:**

File #: 43121-002

Inv #: 27238

**RE:** MCAD - Pharmaceutical Product Development

<b>DATE</b>	<b>DESCRIPTION</b>		<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
Feb-10-19	Draft/revise rebuttal.	BW	2.20	990.00	PJH
Feb-25-19	Conference with client re: stock option issue.	BW	0.20	90.00	PJH
	Totals		2.40	\$1,080.00	
PJH	Total Hrs Billed 2.40	Rate \$450.00	Total Fees	\$1,080.00	
	<b>Total Fee &amp; Disbursements</b>			<b>\$1,080.00</b>	
			<b>Balance Now Due</b>	<b>\$1,080.00</b>	

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

May 2, 2019

**Attention:**

File #: 43121-003

Inv #: 27509

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Apr-02-19	Conference with client re: status and strategy.	BW	0.30	142.50	PJH
Apr-17-19	Conference with client re: status and strategy (.4); brief research regarding venue issues (.8).	BW	1.20	570.00	PJH
Apr-22-19	Conference with client re: status and next steps.	BW	0.20	95.00	PJH
	Totals		1.70	\$807.50	
PJH	Total Hrs Billed 1.70	Rate \$475.00	Total Fees	\$807.50	
	<b>Total Fee &amp; Disbursements</b>			<b>\$807.50</b>	
			<b>Balance Now Due</b>	<b>\$807.50</b>	

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

July 15, 2019

**Attention:**

File #: 43121-003

Inv #: 27867

**RE:** Litigation - Pharmaceutical Product Development

<b>DATE</b>	<b>DESCRIPTION</b>		<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
May-31-19	Draft complaint (1.3); confer with client and L. Passinisi re: same (.1); confer with L. Passinisi re: case background and discovery preparation (.1).	BW	1.50	675.00	PJH
	Confer with P. Hannon and conference call with client.	BW	0.20	70.00	LAP
	Review timeline of events and retrieve discovery from client.	BW	0.40	140.00	LAP
Jun-06-19	Email client re: status and discovery.	BW	0.20	70.00	LAP
Jun-14-19	Draft complaint.	BW	2.30	1,035.00	PJH
Jun-28-19	Finalize and file complaint.	BW	1.80	810.00	PJH
	Totals		6.40	\$2,800.00	
PJH	<b>Total Hrs Billed</b> 5.60	<b>Rate</b> \$450.00		<b>Total Fees</b> \$2,520.00	
LAP	<b>Total Hrs Billed</b> 0.80	<b>Rate</b> \$350.00		<b>Total Fees</b> \$280.00	



DISBURSEMENTS

(Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

May-17-19	11.25	
Totals	\$11.25	
Total Fee & Disbursements		\$2,811.25
	Balance Now Due	\$2,811.25

TAX ID Number

13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

August 9, 2019

**Attention:**

File #: 43121-003

Inv #: 27970

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jul-11-19	File notice of appearance (.4); prepare summons and complaint to be served; brief conference with P. Hannon (.4).	BW	0.80	280.00	LAP
	Attention to documents provided by client (3.0); prepare same for initial disclosure review (.5).	BW	3.50	437.50	JD
Jul-15-19	Correspondence with process server re: serving complaint.	BW	0.10	35.00	LAP
Jul-16-19	Attention to email from opposing counsel re: extension.	BW	0.10	35.00	LAP
	Totals		4.50	\$787.50	

LAP	Total Hrs Billed	1.00	Rate	\$350.00	Total Fees	\$350.00
JD	Total Hrs Billed	3.50	Rate	\$125.00	Total Fees	\$437.50

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Jul-03-19	Filing fee	400.00	
Jul-26-19	Constableservice fee	75.00	
	Totals	\$475.00	
	<b>Total Fee &amp; Disbursements</b>		<b>\$1,262.50</b>
	<b>Balance Now Due</b>		<b>\$1,262.50</b>

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

September 11, 2019

**Attention:**

File #: 43121-003

Inv #: 28123

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Aug-16-19	Brief review of answer to complaint and email client re: the same.	BW	0.30	105.00	LAP
Aug-19-19	Email to L. Passinisi re: assignment to establish discovery plan and related strategy (.2); review file in connection with same (.3).	BW	0.50	225.00	PJH
	Review complaint, answer and MCAD pleadings (.8); begin compiling discovery strategy (1.0).	BW	1.80	630.00	LAP
Aug-20-19	Review answer and strategize re: next steps.	BW	1.20	540.00	PJH
	Additional analysis of strategy and discovery to request.	BW	1.80	630.00	LAP
Aug-21-19	Strategize re: discovery and related matters (.7); conference with L. Passinisi re: same (.3); attention to possible expert witnesses (1.1).	BW	2.10	945.00	PJH
	Confer with P. Hannon re:	BW	3.00	1,050.00	LAP

strategy (.3); telephone call with client re: discovery/deadlines (.8); analyze potential comparators and consider damages available (1.4); email opposing counsel re: Rule 16 conference (.2); consider potential experts (.3).

Aug-22-19	Analysis as to available damages (.6); confer with P. Hannon (.3); email client re: initial disclosures and damages (.7).	BW	1.60	560.00	LAP
Aug-23-19	Attention to email from client and preparation for scheduling conference with opposing counsel.	BW	0.50	175.00	LAP
Aug-26-19	Rule 16 conference with opposing client (.2); follow up email with opposing counsel (.1); attention to client email (.1).	BW	0.40	140.00	LAP
Aug-27-19	Attention to client email re: damages and witnesses (1.0); begin drafting initial disclosures (.9).	BW	1.90	665.00	LAP
Aug-29-19	Email to client re: damages and dates.	BW	0.30	105.00	LAP
Aug-30-19	Email opposing counsel re: dates.	BW	0.10	35.00	LAP
Totals			15.50	\$5,805.00	

PJH	Total Hrs Billed	3.80	Rate	\$450.00	Total Fees	\$1,710.00
LAP	Total Hrs Billed	11.70	Rate	\$350.00	Total Fees	\$4,095.00

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Aug-05-19	Federal Express	46.34
Totals		\$46.34

**Total Fee & Disbursements**

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**\$5,851.34**

**Balance Now Due**

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**\$5,851.34**

TAX ID Number 13-4299300

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Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

October 11, 2019

**Attention:**

File #: 43121-003

Inv #: 28258

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Sep-03-19	Draft and send Rule 16.1 settlement correspondence.	BW	0.30	105.00	LAP
Sep-04-19	Review documents provided by client (1.8); revise initial disclosures (.6); telephone call with client re: witnesses (.5); begin drafting discovery requests (1.2).	BW	4.10	1,435.00	LAP
Sep-05-19	Further revisions to discovery and joint statement.	BW	0.30	105.00	LAP
Sep-06-19	Continue drafting discovery requests and initial disclosures (3.7); emails and telephone call with client re: discovery (.4).	BW	4.10	1,435.00	LAP
Sep-09-19	Continue drafting discovery requests.	BW	1.30	455.00	LAP
Sep-10-19	Continue drafting interrogatories.	BW	1.70	595.00	LAP
Sep-16-19	Revise initial disclosures.	BW	0.60	270.00	PJH

Sep-17-19	Draft/revise interrogatories and requests for production.	BW	2.40	1,080.00	PJH
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	Telephone call with P. Hannon and client re: status.	BW	0.20	70.00	LAP
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	Totals		15.00	<hr/> \$5,550.00	
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PJH	Total Hrs Billed	3.00	Rate	\$450.00	Total Fees	\$1,350.00
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LAP	Total Hrs Billed	12.00	Rate	\$350.00	Total Fees	\$4,200.00
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	Total Fee & Disbursements					<hr/> \$5,550.00
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	Balance Now Due					<hr/> \$5,550.00
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TAX ID Number 13-4299300



***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

November 18, 2019

File #: 43121-003

Inv #: 28418

**Attention:****RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Oct-16-19	Finalize and serve initial disclosures and first set of discovery requests.	BW	1.20	540.00	PJH
	Totals		1.20	<u>\$540.00</u>	
PJH	Total Hrs Billed 1.20	Rate \$450.00	Total Fees	\$540.00	
	<b>Total Fee &amp; Disbursements</b>			<u><b>\$540.00</b></u>	
			<b>Balance Now Due</b>	<u><b>\$540.00</b></u>	

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

December 6, 2019

**Attention:**

File #: 43121-003

Inv #: 28510

**RE:** Litigation - Pharmaceutical Product Development

<b>DATE</b>	<b>DESCRIPTION</b>		<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
Nov-25-19	Attention to email re: discovery (.3); review and revise proposed confidentiality stipulation (.4); email to client re: same and status (.2).	BW	0.90	405.00	PJH
Nov-26-19	Conference with client re: status and next steps.	BW	0.50	225.00	PJH
Nov-27-19	Meeting with P. Hannon re: preparation for discovery responses (.5); review discovery requests and pleadings (1.2); legal research re: privilege (.4).	BW	2.10	682.50	HW
	Totals		3.50	\$1,312.50	
PJH	Total Hrs Billed 1.40	Rate \$450.00	Total Fees	\$630.00	
H W	Total Hrs Billed 2.10	Rate \$325.00	Total Fees	\$682.50	
<b>Total Fee &amp; Disbursements</b>				<b>\$1,312.50</b>	

**Balance Now Due**

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**\$1,312.50**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

January 24, 2020

**Attention:**

File #: 43121-003

Inv #: 28674

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Dec-03-19	Conference with P. Hannon re: preparation of responses to Interrogatories and Requests for Production.	BW	0.80	260.00	HW
Dec-05-19	Confer with P. Hannon re: status of discovery deadlines and preparation of responses to Requests for Production and Interrogatories.	BW	0.10	32.50	HW
Dec-09-19	Initial drafting of responses to Defendant's Interrogatories.	BW	2.20	715.00	HW
Dec-10-19	Emails to/from opposing counsel re: confidentiality stip and discovery matters.	BW	0.30	135.00	PJH
	Draft responses to Interrogatories.	BW	4.60	1,495.00	HW
Dec-11-19	Draft responses to Interrogatories.	BW	3.40	1,105.00	HW
Dec-12-19	Draft Responses to Interrogatories.	BW	5.30	1,722.50	HW

Dec-13-19	Draft Responses to Interrogatories (3.0); draft Responses to Requests for Production (2.8).	BW	5.80	1,885.00	HW
Dec-20-19	Emails to/from oppoing counsel re: discovery (.2); draft fee estimate for client (.5); attention to discovery responses (.2).	BW	0.90	405.00	PJH
Dec-31-19	Conference with P. Hannon re: draft responses to Interrogatories and Requests for Production (.4); review same (1.1).	BW	1.50	487.50	HW
Totals			24.90	\$8,242.50	

PJH	Total Hrs Billed	1.20	Rate	\$450.00	Total Fees	\$540.00
H W	Total Hrs Billed	23.70	Rate	\$325.00	Total Fees	\$7,702.50

**Total Fee & Disbursements** **\$8,242.50**

**Balance Now Due** **\$8,242.50**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

February 12, 2020

**Attention:**

File #: 43121-003

Inv #: 28764

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jan-02-20	Revise draft of Responses to Interrogatories (1.1); legal research re: Social Security benefits and mitigation of damages (.7).	BW	1.80	585.00	HW
Jan-03-20	Revise and finalize memo to client re: search for documents (1.0); confer with client re: status and strategy (.5).	BW	1.50	675.00	PJH
	Revise draft Responses to Interrogatories and Requests for Production (1.7); prepare Memo re: identifying documents and ESI pursuant to Requests for Production (3.4); telephone conference with P. Hannon and L. Menninger re: responding to Requests for Production (.4).	BW	5.50	1,787.50	HW
Jan-08-20	Revise draft Response to Requests for Production (.7); conference with P. Hannon re: Response to Requests for Production (.5).	BW	1.20	390.00	HW

Jan-09-20	Attention to emails; download discovery files.	BW	0.10	32.50	HW
Jan-16-20	Initial review of PPD document production (2.2); email to client re: same and next steps (.2).	BW	2.40	1,080.00	PJH
Jan-23-20	Conference with P. Hannon re: strategy and preparation of discovery requests and responses.	BW	0.40	130.00	HW
Jan-30-20	Review and organize documents to be produced (1.0); analyze Defendant's Requests for Production re: documents requested (.8); initial attorney-client privilege review of client emails and other files (.6).	BW	2.40	780.00	HW

Totals	15.30	\$5,460.00
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PJH	Total Hrs Billed	3.90	Rate	\$450.00	Total Fees	\$1,755.00
H W	Total Hrs Billed	11.40	Rate	\$325.00	Total Fees	\$3,705.00

Total Fee & Disbursements	\$5,460.00
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Balance Now Due	\$5,460.00
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

March 17, 2020

**Attention:**

File #: 43121-003

Inv #: 28900

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Feb-04-20	Organization of production of documents to Defendant (.6); Attorney-client privilege review of documents to be produced (.4).	BW	1.00	325.00	HW
Feb-05-20	Conference with client re: status and strategy.	BW	0.60	270.00	PJH
	Telephone conference with P. Hannon and L. Menninger re: status of discovery and depositions (.6); complete organization of documents for production to Defendant (.8).	BW	1.40	455.00	HW
Feb-07-20	Assistance with preparation of Bates stamped production of documents to Defendant.	BW	0.20	65.00	HW
Feb-12-20	Attention to discovery.	BW	0.20	90.00	PJH
	Deficiency review of Defendant's production of documents and Responses to Plaintiff's Interrogatories.	BW	1.40	455.00	HW



Feb-17-20	Revise interrogatory answers (.9); email to client (.2).	BW	1.10	495.00	PJH
Feb-18-20	Review of Defendant's production of documents and Plaintiff's Requests for Production; preparation of deficiency chart analyzing documents produced, documents promised but not produced, and documents Defendant indicated it would not produce.	BW	4.10	1,332.50	HW
Feb-19-20	Review Defendant's production of documents; prepare chart of materials produced and materials still outstanding.	BW	3.90	1,267.50	HW
Feb-20-20	Complete chart of PPD production (3.5); draft questions for opposing counsel to ascertain what was produced, what is outstanding, and which requests for production Defendant does not have responsive documents for re: Plaintiff's Requests for Production (1.8); assistance with preparation of Plaintiff's production of documents to Defendant (.4).	BW	5.70	1,852.50	HW
Feb-26-20	Revise, finalize and serve responses to document requests (1.1); revise, finalize and serve document production (1.7).	BW	2.80	1,260.00	PJH
	Conference with P. Hannon re: status of production to PPD and responses to PPD's production of documents.	BW	0.10	32.50	HW
Feb-28-20	Confer with client re: deposition preparation (.6); revise interrogatory answers (3.3);	BW	4.20	1,890.00	PJH

attention to redaction on  
supplemental document  
production (.3).

Totals	26.70	\$9,790.00
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P J H	Total Hrs Billed	8.90	Rate	\$450.00	Total Fees	\$4,005.00
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H W	Total Hrs Billed	17.80	Rate	\$325.00	Total Fees	\$5,785.00
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Total Fee & Disbursements	\$9,790.00
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Balance Now Due	\$9,790.00
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

April 3, 2020

**Attention:**

File #: 43121-003

Inv #: 28963

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Mar-02-20	Revise/finalize and serve interrogatory answers (1.2); prepare supplemental production (1.2).	BW	2.40	1,080.00	PJH
	Preparation of supplemental production.	BW	0.40	130.00	HW
Mar-04-20	Confer with client re: deposition preparation (2.9); prepare for same (.6).	BW	3.50	1,575.00	PJH
	Deposition preparation with P. Hannon and L. Menninger (2.9); conference with P. Hannon re: deposition preparation (.7).	BW	3.60	1,170.00	HW
	Conference with P. Hannon re: researching options for expert witnesses.	BW	0.10	32.50	HW
Mar-05-20	Prepare for and attend client deposition.	BW	8.70	3,915.00	PJH
Mar-12-20	Contact doctors re: potentially serving as expert witnesses on anxiety (.4); email correspondence	BW	0.70	227.50	HW

with P. Summergrad re: initial call  
re: serving as expert (.3).

Mar-13-20	Conference with H. Watson and potential expert witness.	BW	0.50	225.00	PJH
	Email communications with potential expert witnesses (.6); teleconference with P. Hannon and potential expert [REDACTED] (.5).	BW	1.10	357.50	HW
Mar-17-20	Telephone interview with potential expert witness P. Summergrad (.8); emails to schedule phone call with potential expert witness [REDACTED] (.4); email P. Hannon re: call with P. Summergrad and next steps (.6).	BW	1.80	585.00	HW
Mar-18-20	Video conference with P. Hannon re: next steps (.1); contact vendor re: expert witness for anxiety (.1); email correspondence with potential witnesses already contacted (.1).	BW	0.30	97.50	HW
Mar-19-20	Interview potential expert (.4); confer with H. Watson re: same (.2).	BW	0.60	270.00	PJH
	Telephone conference with P. Hannon and [REDACTED] re: serving as expert witness (.6); research and contact expert witness referral services re: expert witness on anxiety (1.2).	BW	1.80	585.00	HW
Mar-20-20	Emails to/from client re: status and strategy.	BW	0.30	135.00	PJH
	Contact expert witness referral service (.2); attention to emails (.2).	NBW	0.40	0.00	HW
Mar-25-20	Draft email to opposing	BW	2.50	1,125.00	PJH

counsel re: deficiencies in document production (.8); analyze potential deponents (.7); email to client re: deposition review (.3); strategies re: second set of requests for production (.7).

Email communications to update potential expert witnesses on status (.2); emails and telephone calls with expert witness referral company representatives (.2).

NBW

0.40

0.00

HW

Mar-26-20

Confer with H. Watson re: potential expert.

BW

0.20

90.00

PJH

Interview potential expert witnesses [REDACTED] (.5); interview potential expert witness [REDACTED] (.4); draft memorandum re: strengths and weaknesses of top expert candidates (.6).

BW

1.50

487.50

HW

Mar-27-20

Attention to memo summarizing expert options and telephone call with P. Hannon re: expert selection.

BW

0.10

32.50

HW

Mar-30-20

Email to opposing counsel re: deposition scheduling.

BW

0.50

225.00

PJH

Email communications with expert referral service representative re: potential candidate.

NBW

0.10

0.00

HW

Mar-31-20

Draft, finalize and serve second request for production of documents.

BW

2.50

1,125.00

PJH

Totals

34.00

\$13,470.00

PJH

Total Hrs 21.70  
Billed

Rate \$450.00

Total Fees \$9,765.00

H W	Total Hrs Billed	12.30	Rate	\$301.22	Total Fees	\$3,705.00
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Mar-31-20	Meninger transcript	708.75
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Totals	\$708.75
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<b>Total Fee &amp; Disbursements</b>	<b>\$14,178.75</b>
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<b>Balance Now Due</b>	<b>\$14,178.75</b>
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

May 21, 2020

**Attention:**

File #: 43121-003

Inv #: 29147

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Apr-13-20	Telephone conference with P. Hannon re: status of expert witness selection.	BW	0.10	32.50	HW
Apr-16-20	Emails to/from client re: expert selection and discovery schedule.	BW	0.50	225.00	PJH
	Attention to email correspondence with L. Menninger and P. Hannon re: selection of expert witness (.1); email P. Summergrad re: notification of selection as expert and confirmation of fees (.2).	BW	0.30	97.50	HW
Apr-17-20	Email correspondence with P. Summergrad re: expert witness retention.	BW	0.10	32.50	HW
Apr-20-20	Email to opposing counsel re: discovery issues (.3); attention to expert selection (.1).	BW	0.40	180.00	PJH
	Totals		1.40	<hr/> \$567.50	

P J H	Total Hrs Billed	0.90	Rate	\$450.00	Total Fees	\$405.00
H W	Total Hrs Billed	0.50	Rate	\$325.00	Total Fees	\$162.50
Total Fee & Disbursements						<hr/> \$567.50
Balance Now Due						<hr/> \$567.50

TAX ID Number 13-4299300



***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

June 19, 2020

**Attention:**

File #: 43121-003

Inv #: 29242

**RE:** Litigation - Pharmaceutical Product Development

<b>DATE</b>	<b>DESCRIPTION</b>		<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
May-15-20	Initial review of additional documents produced by Defendant (.9); confer with H. Watson re: status and next steps (.3).	BW	1.20	540.00	PJH
	Telephone call with P. Hannon re: expert witness retainer language and review of Defendant's supplemental production.	BW	0.30	97.50	HW
May-18-20	Draft expert witness letter retention agreement for expert witness P. Summergrad.	BW	1.80	585.00	HW
May-28-20	Attention to emails re: deposition scheduling.	BW	0.10	45.00	PJH
	Totals		3.40	\$1,267.50	
PJH	Total Hrs Billed 1.30	Rate	\$450.00	Total Fees	\$585.00
H W	Total Hrs Billed 2.10	Rate	\$325.00	Total Fees	\$682.50

**Total Fee & Disbursements**

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**\$1,267.50**

**Balance Now Due**

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**\$1,267.50**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

July 30, 2020

**Attention:**

File #: 43121-003

Inv #: 29353

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jun-04-20	Attention to finalizing P. Summergrad engagement (.5); attention to email re: third-party subpoenas (.3); discuss discovery status and strategy with H. Watson (.6).	BW	1.40	630.00	PJH
	Telephone call with P. Hannon re: finalizing expert witness agreement with P. Summergrad and next steps for working with expert, gathering certain additional discovery, and speaking with L. Menninger (.6); email correspondence with P. Summergrad re: review and approval of expert witness retainer agreement (.7).	BW	1.30	422.50	HW
Jun-05-20	Email correspondence with L. Menninger re: expert witness retainer agreement and scheduling of telephone call re: case status and updates.	BW	0.10	32.50	HW
Jun-08-20	Attention to emails re:	BW	0.20	65.00	HW

execution of expert retainer agreement.

Jun-09-20	Attention to emails re: Burbano subpoena.	BW	0.20	90.00	PJH
Jun-10-20	Attention to discovery strategy.	BW	0.60	270.00	PJH
	Telephone call with L. Menninger and P. Hannon re: case status and updates (.4); circulate fully executed copies of P. Summergrad expert retainer (.2); legal research re: work product doctrine protections for draft expert reports and attorney-expert communications under federal rules (2.8).	BW	3.40	1,105.00	HW
Jun-15-20	Preparation for telephone call with P. Summergrad (.4); telephone call with P. Summergrad re: overview of expert witness process and initial review of evidence (1.0).	BW	1.40	455.00	HW
Jun-16-20	Prepare medical records and other documents for P. Summergrad review (4.0); prepare chart listing evidence organized and sent to P. Summergrad (1.1).	BW	5.10	1,657.50	HW
Jun-17-20	Continue organization, upload, and charting for first batch of documents to deliver to expert P. Summergrad.	BW	3.80	1,235.00	HW
Jun-18-20	Discuss legal research assignment re: legal standards and jury instructions for failure to accommodate claim under federal and Massachusetts law with law clerk M. Black (.5); finalize document preparation	BW	3.10	1,007.50	HW

for delivery to P. Summergrad (1.7); telephone call with P. Hannon re: next steps for expert (.5); email P. Summergrad re: delivery of first batch of documents and scheduling of follow-up call (.4).

Jun-22-20	Researching federal elements for ADA in Menninger case.	BW	3.00	375.00	MB
Jun-23-20	Outlining federal elements for ADA in Menninger case; researching state claims in MA courts.	BW	4.70	587.50	MB
Jun-24-20	Conference with P. Summergrad and H. Watson re: expert report.	BW	0.60	270.00	PJH
	Telephone call with P. Summergrad and P. Hannon re: initial document review and overview of issues for expert analysis (.6); prepare and send second batch of documents for review (1.2).	BW	1.80	585.00	HW
Jun-25-20	Initial review of legal research by law clerk M. Black.	BW	0.20	65.00	HW
	Researching case law in Mass. re: state law claims for MGL 151B.	BW	5.75	718.75	MB
	Finalizing research re: ADA and MGL 151B claims in District and State court; sending research to H. Watson.	BW	5.00	625.00	MB
Jun-29-20	Review legal research memorandum from law clerk M. Black re: elements of failure to accommodate claims under federal and Massachusetts law.	BW	0.40	130.00	HW

	Comparing circuit court decisions; preparing circuit court decisions documents for H. Watson.	BW	1.70	212.50	MB
Jun-30-20	Finalizing circuit court comparison for H. Watson.	BW	1.50	187.50	MB

Totals	45.25	<u>10,726.25</u>
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P J H	Total Hrs Billed	2.80	Rate	\$450.00	Total Fees	\$1,260.00
H W	Total Hrs Billed	20.80	Rate	\$325.00	Total Fees	\$6,760.00
M B	Total Hrs Billed	21.65	Rate	\$125.00	Total Fees	\$2,706.25

Total Fee & Disbursements	<u>\$10,726.25</u>
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Balance Now Due	<u>\$10,726.25</u>
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TAX ID Number      13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

August 31, 2020

**Attention:**

File #: 43121-003

Inv #: 29475

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jul-02-20	Meeting with law clerk M. Black re: legal research on failure to accommodate claims.	BW	0.90	292.50	HW
	Reviewing ADA failure to accommodate cases to prepare for H. Watson meeting; meeting with H. Watson re: updating current Menninger research with circuit court comparisons; reviewing burden distribution in various circuit courts to compare with 1st circuit.	BW	3.80	475.00	MB
Jul-03-20	Reviewing burden distribution in various circuit courts to compare with 1st circuit.	BW	5.50	687.50	MB
Jul-06-20	Reviewing circuit court instructions.	BW	3.10	387.50	MB
Jul-09-20	Attention to deposition scheduling (.1); confer with client re: settlement (.3); email to opposing counsel re: same (.1).	BW	0.50	225.00	PJH

Jul-10-20	Organizing circuit court opinions re: burden of engaging in interactive process.	BW	2.00	250.00	MB
Jul-13-20	Attention to various discovery issues (.9); confer with M. Black re: same (.2); attention to deposition scheduling (.2); emails to/from opposing counsel re: same (.2).	BW	1.50	675.00	PJH
	Reviewing documents and emails re: Menninger from P. Hannon; calling Dr. Burbona re: Menninger medical records	BW	0.80	100.00	MB
Jul-14-20	Coordinate with Magna re: Menninger depositions; interactive process research for H. Watson.	BW	1.20	150.00	MB
Jul-16-20	Finalized circuit court research for H. Watson.	BW	5.00	625.00	MB
Jul-17-20	Telephone call with P. Hannon re: next steps for expert witness P. Summergrad (.5); email P. Summergrad re: status call (.2).	BW	0.70	227.50	HW
Jul-19-20	Prepare for deposition of H. Mekerri.	BW	3.20	1,440.00	PJH
Jul-20-20	Conduct deposition of H. Mekerri.	BW	6.50	2,925.00	PJH
Jul-22-20	Confer with client re: status and strategy.	BW	0.50	225.00	PJH
Jul-23-20	Prepare for and conduct deposition of C. Fikry.	BW	9.60	4,320.00	PJH
	Scheduled deposition with Ogletree; drafted interrogatory deficiency letter for P. Hannon.	BW	1.70	212.50	MB



Jul-24-20	Confer with P. Summergrad re: review of documents and next steps in preparing expert report (.6); attention to documents produced by PPD (.9); confer with I. Gavish re: assignment to assist with deposition preparation (.3); confer with M. Black re: assignment to assist with drafting of expert report (.4).	BW	2.20	990.00	PJH
	Search for documents in connection with D. Ballweg deposition.	BW	0.80	100.00	JD
	Conference with P. Hannon re: expert witnesses testifying re: reasonable accommodations; case research on expert witness testifying for ADA.	BW	4.30	537.50	MB
Jul-25-20	Continue search for documents; prepare same for use in Ballweg deposition; draft memo to P. Hannon re: same.	BW	4.80	600.00	JD
Jul-27-20	Prepare for and conduct deposition of D. Ballweg.	BW	10.50	4,725.00	PJH
	Expert witness research.	BW	3.40	425.00	MB
Jul-28-20	Prepare for and conduct deposition of C. St. John.	BW	9.90	4,455.00	PJH
	Reviewed circuit court decisions for burden in ADA.	BW	2.70	337.50	MB
Jul-29-20	Email correspondence with P. Summergrad and L. Menninger to arrange medical examination and prep session.	BW	0.80	260.00	HW
Jul-30-20	Attention to emails (.2); draft supplemental interrogatories re: punitive damages and financial resources of	BW	2.10	682.50	HW

defendant (.3); legal research re:  
punitive damages (1.2); research  
docket and SEC filings re:  
defendant's corporate structure and  
publicly available information re:  
financial resources (.4).

Jul-31-20	Complete drafting of interrogatories re: punitive damages.	BW	1.70	552.50	HW
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Totals			89.70	<u>552.50</u>	
				\$26,882.50	

P J H	Total Hrs Billed	44.40	Rate	\$450.00	Total Fees	\$19,980.00
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H W	Total Hrs Billed	6.20	Rate	\$325.00	Total Fees	\$2,015.00
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J D	Total Hrs Billed	5.60	Rate	\$125.00	Total Fees	\$700.00
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M B	Total Hrs Billed	33.50	Rate	\$125.00	Total Fees	\$4,187.50
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<b>Total Fee &amp; Disbursements</b>					<u>\$26,882.50</u>
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<b>Balance Now Due</b>	<u>\$26,882.50</u>
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

September 25, 2020

**Attention:**

File #: 43121-003

Inv #: 29592

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Aug-05-20	Prepare videoconference logistics for medical examination (.2); review law clerk legal research memorandum re: elements of failure to accommodate claims (.8); additional legal research re: elements of failure to accommodate claim (3.2).	BW	4.20	1,365.00	HW
Aug-06-20	Confer with client re: upcoming meeting with expert.	BW	0.50	225.00	PJH
	Preparatory call with P. Hannon and L. Menninger for expert examination by P. Summergrad (.5); initial organization of evidence for sending to P. Summergrad as final batch (1.8).	BW	2.30	747.50	HW
Aug-07-20	Initiate videoconference for medical examination with P. Summergrad (.2); organization of evidence for sending to P. Summergrad's review (2.4); review and update chart of evidence	BW	4.40	1,430.00	HW

exchanged in discovery to send to  
P. Summergrad (1.8).

Aug-08-20	Complete compilation of evidence and updating of P. Summergrad evidence chart (3.0); draft memorandum to send to P. Summergrad re: organization of expert report and issues to address (2.0).	BW	5.00	1,625.00	HW
Aug-10-20	Confer with counsel for Dr. K re: deposition testimony.	BW	0.50	225.00	PJH
	Telephone call with P. Hannon re: draft expert witness questions, next steps for expert witness, and correspondence with opposing counsel re: extension of expert witness report deadline (.6); contact A. Burbano re: request for medical records (.2); draft motion for extension of deadlines (.3); research sample expert witness reports (3.2).	BW	4.30	1,397.50	HW
	Search for expert witness sample for use in Menninger case.	BW	2.00	250.00	MB
Aug-11-20	Attention to deposition logistics (.4); confer with M. Menninger re: same (.4); confer with T. Hart re: same (.4).	BW	1.20	540.00	PJH
	Telephone call with L. Menninger re: Scheduling Order deadlines (.5); draft Motion for Extension of Scheduling Order Deadlines (.3); email correspondence with opposing counsel R. Mandel and A. Shaw re: extension of all deadlines (.2); revise draft Motion for Extension (.2); revise draft of questions, instructions and	BW	6.30	2,047.50	HW

legal guidance for expert witness  
P. Summergrad (4.8); contact P.  
Summergrad re: telephone call on  
status and next steps (.3).

Aug-12-20	Confer with H. Watson and P. Summergrad re: expert witness analysis (.8); confer with H. Watson re: same and strategy (.4); revise memo re: framing questions for P. Summergrad to address (.4).	BW	1.60	720.00	PJH
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	Telephone call with P. Summergrad and P. Hannon re: next steps (.8); telephone call with P. Hannon re: materials to send to P. Summergrad (.4); send P. Summergrad third batch of documents and first two questions for expert report (2.2); file Joint Motion for Extension of Scheduling Order deadlines (.3).	BW	3.70	1,202.50	HW
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Aug-13-20	Defend depositions of M. Menniger and T. Hart (5.3); confer with client re: same (.4).	BW	5.70	2,565.00	PJH
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Totals			41.70	\$14,340.00	
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P J H	Total Hrs Billed	9.50	Rate	\$450.00	Total Fees	\$4,275.00
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H W	Total Hrs Billed	30.20	Rate	\$325.00	Total Fees	\$9,815.00
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M B	Total Hrs Billed	2.00	Rate	\$125.00	Total Fees	\$250.00
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Aug-13-20	Datamine project management	385.00
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Totals	\$385.00
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**Total Fee & Disbursements**

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**\$14,725.00****Balance Now Due**

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**\$14,725.00**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

October 21, 2020

**Attention:**

File #: 43121-003

Inv #: 29709

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Sep-11-20	Email correspondence with P. Summergrad and L. Menninger re: first invoice for expert witness services and confirmation of exhibits shared with P. Summergrad.	BW	0.80	260.00	HW
Sep-21-20	Contact expert witness referral service re: damages expert candidate.	NBW	1.00	0.00	HW
Sep-23-20	Interview damages expert witness candidate F. Carr (.5); review candidate submissions from [REDACTED] (.4).	NBW	0.90	0.00	HW
Sep-24-20	Schedule calls with damages expert witness candidates D. Welsch and B. Jonas, and [REDACTED]	BW	0.40	130.00	HW
Sep-25-20	Telephone interviews of expert witness candidates [REDACTED] and D. Welsch and B. Jonas.	BW	1.50	487.50	HW
Sep-28-20	Telephone call with P. Hannon	BW	1.00	325.00	HW

re: expert candidates and recommended choices (.6); email expert witness candidates and referral services re: selection of Jonas & Welsch (.4).

Sep-29-20	Email correspondence with Forensis Group agents re: expert witness retention contract for B. Jonas and D. Welsch.	BW	0.30	97.50	HW
Sep-30-20	Emails with P. Summergrad re: status of expert report drafting and scheduling call (.3); email correspondence with Forensis Group re: expert witness cost estimate and review of expert witness retention agreement (.3).	BW	0.60	195.00	HW

Totals	6.50	\$1,495.00
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H W	Total Hrs Billed	6.50	Rate	\$230.00	Total Fees	\$1,495.00
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Sep-02-20	Marianna Kessimian transcript	626.85
Sep-10-20	Hosted data	200.00
Sep-16-20	Mason Menninger/Tonya Hart transcript	651.85
Sep-25-20	Chad StJohn transcript	1,487.80
	Ballweg transcript	1,070.45
	Fikry transcript	889.80
Totals		\$4,926.75

<b>Total Fee &amp; Disbursements</b>	<b>\$6,421.75</b>
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<b>Balance Now Due</b>	<b>\$6,421.75</b>
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TAX ID Number 13-4299300



***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

November 13, 2020

**Attention:**

File #: 43121-003

Inv #: 29827

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Oct-02-20	Telephone call with P. Summergrad re: initial partial draft of expert report (.8); review evidence and send annotated comments of draft report and additional two questions for review to P. Summergrad (4.2); email Complaint to damages experts B. Jonas and D. Welsch (.3); emails with L. Menninger re: expert retainer agreement and status of P. Summergrad interview and other topics (.6).	BW	5.90	1,917.50	HW
Oct-05-20	Telephone call with D. Welsch (.2); send first tranche of files for review to D. Welsch and B. Jonas (.3).	BW	0.50	162.50	HW
Oct-07-20	Confer with P. Summergrad re: report.	BW	0.20	90.00	PJH
Oct-09-20	Attention to outstanding discovery issues (.5); confer with opposing counsel re: same (.3).	BW	0.80	360.00	PJH

Oct-13-20	Prepare and deliver documents for review by damages expert B. Jonas (1.9); review and respond by email to request for information and additional documents from damages expert (.6); email L. Menninger re: same (.4); review documents sent by L. Menninger (2.5); analyze stock option documents and income and bonus projections (3.2).	BW	8.60	2,795.00	HW
Oct-14-20	Email P. Summergrad re: status of review of expert report draft (1.9); email correspondence with L. Menninger re: additional documents and information for damages expert report (1.8); telephone call with L. Menninger re: damages questions (1.5); correspondence with L. Menninger re: stock options documents (2.6).	BW	7.80	2,535.00	HW
Oct-15-20	Compile and email B. Jonas new batch of files for review for damages report (1.9); telephone call with B. Jonas (.5); correspondence with Forensics Group representative re: expert witness agreement (.4).	BW	2.80	910.00	HW
Oct-16-20	Email correspondence with D. Lane, assistant to damages expert B. Jonas, re: follow-up questions on compensation and other items of damages (1.9); telephone call with B. Jonas re: questions and follow-ups (.3); review long-term disability plan to advise expert re: whether benefits were lienable (.5); email correspondence with L. Menninger re: additional questions (.3); send new batch of documents to damages expert (1.0).	BW	4.00	1,300.00	HW

Oct-17-20	Email B. Jonas and D. Lane with answers to questions and additional documents (.8); telephone call with B. Jonas to follow up on additional questions (.5); email correspondence with P. Hannon re: analysis of stock option documents (.2); email P. Summergrad to schedule discussion conference re: expert report (.2).	BW	1.70	552.50	HW
Oct-19-20	Review P. Summergrad report and begin drafting comments re: same (2.4); begin drafting email to opposing counsel re: deficiencies in privilege log (1.0).	BW	3.40	1,530.00	PJH
	Telephone call with B. Jonas (.4); email correspondence with L. Menninger re: additional documents for damages experts (1.2); deliver damages documents to experts (.6); read and review draft expert report and exhibit table (2.1).	BW	4.30	1,397.50	HW
Oct-20-20	Comment on draft report of P. Summergrad (3.2); confer with Summergrad and H. Watson re: same (1.1); finalize email to opposing counsel re: privilege issues (.6); prepare for and attend status conference (1.2).	BW	6.10	2,745.00	PJH
	Legal research re: collateral source rule under ADA and Chapter 151B with respect to long-term disability insurance and SSDI payments as mitigation of damages (2.0); draft and send comments to experts on damages expert report (1.0); telephone call with B. Jonas re: comments to first draft of damages expert report (.3); attend status conference with Judge	BW	5.10	1,657.50	HW

Sorokin (NC); correspondence with B. Jonas and D. Lane re: preparation of second table and reorganization of report to prioritize non-mitigated number (.6); videoconference with P. Summergrad (NC); draft detailed comments to P. Summergrad report and email to P. Hannon (1.2).

Oct-21-20	Review and revise comments to expert reports (1.1); conferences with H. Watson re: same (.3).	BW	1.40	630.00	PJH
	Videoconference with P. Hannon, B. Jonas and D. Lane re: draft expert report (1.1); draft comments to medical expert report for P. Summergrad review (4.5); email correspondence with L. Menninger re: latest draft of damages expert report (1.4); review client comments to damages report re: method of estimating average salary and bonus increases (1.1).	BW	8.10	2,632.50	HW
Oct-22-20	Finalize expert reports (.9); confer with H. Watson re: same (.2); confer with experts re: same (.2); confer with client re: same (.2).	BW	1.50	675.00	PJH
	Implement final edits to P. Summergrad medical expert report (1.3); correspondence with P. Summergrad re: finalization of report, updated C.V. for attachment, and signature to complete file (2.9); telephone call with B. Jonas and D. Lane to review prefinal draft of report (1.2); follow-up telephone calls with B. Jonas and D. Lane re: revised calculation method of bonus projections and other proofreading matters for final report (2.1); prepare and compile final pdf of report (.8); serve	BW	8.60	2,795.00	HW

medical and damages expert  
reports on opposing counsel (.3).

Oct-23-20	Telephone call with P. Hannon re: client question re: sharing report (.4); email response to L. Menninger (.4).	BW	0.80	260.00	HW
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Totals		71.60	<u>24,945.00</u>
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P J H	Total Hrs Billed 13.40	Rate \$450.00	Total Fees \$6,030.00
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H W	Total Hrs Billed 58.20	Rate \$325.00	Total Fees \$18,915.00
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Oct-16-20	Hosted data	200.00
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Totals	<u>200.00</u>
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<b>Total Fee &amp; Disbursements</b>	<u><b>\$25,145.00</b></u>
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<b>Balance Now Due</b>	<u><b>\$25,145.00</b></u>
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

December 21, 2020

**Attention:**

File #: 43121-003

Inv #: 29943

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Nov-02-20	Discuss case status and upcoming Motion to Compel with P. Hannon.	BW	0.20	65.00	HW
Nov-10-20	Prepare for and conduct deposition of B. McKinnon (6.9); email to client re: status and next steps (.2).	BW	7.10	3,195.00	PJH
	Prewriting for Motion to Compel.	BW	2.60	845.00	HW
Nov-12-20	Legal research re: attorney-client privilege and work product doctrine for Motion to Compel.	BW	2.80	910.00	HW
Nov-13-20	Drafting of factual background of Motion to Compel.	BW	1.30	422.50	HW
	Email correspondence with law clerk M. Black re: legal research on standard of review for Motion to Compel.	BW	0.30	97.50	HW

Nov-14-20	Legal research re: work product doctrine.	BW	1.60	520.00	HW
	Drafting of factual background for Motion to Compel.	BW	4.00	1,300.00	HW
Nov-15-20	Legal research re: attorney-client privilege.	BW	1.00	325.00	HW
	Drafting of legal argument on attorney-client privilege in Memorandum of Law in Support of Motion to Compel.	BW	3.10	1,007.50	HW
	Drafting of legal argument on work product doctrine in Memorandum of Law in Support of Motion to Compel.	BW	6.30	2,047.50	HW
	Drafting of introduction to Motion to Compel.	BW	0.80	260.00	HW
Nov-16-20	Prepare exhibits to Memorandum of Law in Support of Motion to Compel.	BW	0.70	227.50	HW
	Supplemental legal research on attorney-client privilege and work product doctrine.	BW	0.90	292.50	HW
Nov-17-20	Revise, finalize and file Motion to Compel (4.8); attention to Motion to Impound (.4).	BW	5.20	2,340.00	PJH
	Prepare additional exhibit pages to Memorandum in Support of Motion to Compel.	BW	0.30	97.50	HW
	Review final draft of Memorandum in Support of Motion to Compel.	BW	0.50	162.50	HW
	Email correspondence with opposing counsel re: confirmation of non-opposition to relief	BW	0.30	97.50	HW

requested in Motion to Impound.

	Draft Motion to Compel.	BW	0.40	130.00	HW
	Draft Motion to Impound.	BW	1.90	617.50	HW
Nov-18-20	Prepare corrected copy of Memorandum of Law in Support of Motion to Compel (.3); correspondence with law clerk re: filing and correcting same (.2).	NBW	0.50	0.00	HW
	Prepare and upload sealed copies of Memorandum of Law in Support of Motion to Compel and confidential exhibits (.7); email correspondence with law clerk re: procedures for same (.2).	NBW	0.90	0.00	HW
Nov-19-20	Attention to emails with Datamine re: discovery data server (.5); download and compile files for law clerk I. Gavish to review (1.1).	NBW	1.60	0.00	HW
	Confer with H. Watson re: timeline/document review assignment.	BW	0.50	62.50	JD
Nov-22-20	Review of pleadings.	BW	2.20	275.00	JD
Nov-23-20	Confer with opposing counsel re: request for Rule 35 exam.	BW	0.30	135.00	PJH
	Conference with P. Hannon re: status and next steps (.3); complete compilation of documents for review by law clerk I. Gavish and email I. Gavish re: same (1.0).	BW	1.30	422.50	HW
Nov-24-20	Email P. Summergrad re:	BW	0.30	97.50	HW





Nov-28-20	Begin deposition review.	BW	2.00	250.00	JD
Nov-29-20	Continue deposition review.	BW	2.00	250.00	JD
Totals			52.90	\$16,452.50	

P J H	Total Hrs Billed	12.60	Rate	\$450.00	Total Fees	\$5,670.00
H W	Total Hrs Billed	33.60	Rate	\$295.98	Total Fees	\$9,945.00
J D	Total Hrs Billed	6.70	Rate	\$125.00	Total Fees	\$837.50

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Nov-10-20	Hosted data	200.00
Nov-16-20	Hacene Mekerri transcript	968.30
Totals		\$1,168.30

**Total Fee & Disbursements** **\$17,620.80**

**Balance Now Due** **\$17,620.80**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

January 20, 2021

**Attention:**

File #: 43121-003

Inv #: 31069

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Dec-01-20	Emails to/from opposing counsel re: scheduling.	BW	0.50	225.00	PJH
	Review of documents and expert report in preparation for telephone call with P. Summergrad (.7); telephone call with P. Summergrad re: [REDACTED] (.7); email memorandum of call and takeaways to P. Hannon (.5).	BW	1.90	617.50	HW
Dec-02-20	Attention to emails re: Rule 35 examination and deadline for Motion to Compel response.	NBW	0.10	0.00	HW
Dec-04-20	Attention to emails re: medical exam (.7); brief online research re: Dr. Kelly (.5).	BW	1.20	540.00	PJH
Dec-06-20	Continue deposition review (St. John).	BW	1.70	212.50	JD
Dec-07-20	Research past cases and previous expert testimony of opposing medical expert M.	BW	2.00	650.00	HW

Kelly (1.2); file request for prior report with Mass. Dept. of Industrial Accidents (.8).

Dec-08-20	Confer with client re: upcoming medical examination.	BW	0.40	180.00	PJH
	Telephone calls with P. Summergrad, P. Hannon, and L. Menninger re: preparation for Rule 35 examination (.6); internet research of opposing expert witness M. Kelly (.8).	BW	1.40	455.00	HW
	Continue deposition review (Ballweg).	BW	1.00	125.00	JD
Dec-09-20	Attention to email from L. Menninger re: Rule 35 examination and follow-up correspondence with P. Hannon.	NBW	0.40	0.00	HW
Dec-10-20	Continue deposition review (Ballweg).	BW	1.20	150.00	JD
Dec-11-20	Email correspondence with P. Summergrad re: [REDACTED] (.2); attention to email correspondence with opposing counsel re: deadline extensions (.1).	BW	0.30	97.50	HW
Dec-12-20	Continue deposition review.	BW	2.00	250.00	JD
Dec-15-20	Complete deposition review (3.0); begin document review (1.2).	BW	5.20	650.00	JD
Dec-16-20	Continue document review.	BW	5.00	625.00	JD
Dec-18-20	Confer with client re: status and next steps.	BW	0.20	90.00	PJH

	Continue document review.	BW	3.00	375.00	JD
Dec-19-20	Begin drafting timeline.	BW	1.50	187.50	JD
Dec-20-20	Continue drafting timeline.	BW	3.20	400.00	JD
Dec-21-20	Attention to emails with law clerk I. Gavish re: factual review and P. Hannon re: process and next steps.	NBW	0.20	0.00	HW
	Draft chart re: contradictions and inconsistencies.	BW	3.50	437.50	JD
Dec-23-20	Telephone call with P. Hannon re: strategy and arguments for reply to Motion to Compel.	BW	0.20	65.00	HW
Dec-28-20	Draft section of Reply Brief on Motion to Compel re: attorney client privilege.	BW	4.10	1,332.50	HW
Dec-29-20	Supplemental legal research on work product doctrine and authorities cited by Defendant in Opposition Brief to Motion to Compel (2.9); draft section of Reply Brief to Motion to Compel re: work product doctrine (4.0).	BW	6.90	2,242.50	HW
Dec-30-20	Revise reply brief in support of motion to compel.	BW	1.20	540.00	PJH
Dec-31-20	Review P. Hannnon comments to draft Reply Brief (.4); minor revisions to Reply Brief (.5); revise Motion for Leave to File Reply (.3); email opposing counsel re: Defendant's position on leave to file a reply brief (.2).	BW	1.40	455.00	HW
	Totals		49.70	\$10,902.50	

PJH	Total Hrs Billed	3.50	Rate	\$450.00	Total Fees	\$1,575.00
H W	Total Hrs Billed	18.90	Rate	\$312.96	Total Fees	\$5,915.00
JD	Total Hrs Billed	27.30	Rate	\$125.00	Total Fees	\$3,412.50

DISBURSEMENTS

(Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Dec-11-20	Brent McKinnon deposition	493.75	
	Hosted data	200.00	
	Totals	\$693.75	
	<b>Total Fee &amp; Disbursements</b>		<b>\$11,596.25</b>
		<b>Balance Now Due</b>	<b>\$11,596.25</b>

TAX ID Number

13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

February 25, 2021

**Attention:**

File #: 43121-003

Inv #: 31198

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jan-04-21	Revise, finalize and file reply brief in support of motion to compel.	BW	2.10	945.00	PJH
Jan-05-21	Conference with P. Hannon re: preparation and strategy for expert depositions and other next steps.	NBW	0.20	0.00	HW
Jan-06-21	Email opposing counsel re: deposition dates for Dr. M. Kelly and redacted emails marked attorney-client privilege (.4); email P. Summergrad re: call to discuss expert report of Dr. M. Kelly (.2); legal research re: expert discovery scope (.9).	BW	1.50	487.50	HW
Jan-07-21	Reviewed documents, prepared timeline and drafted chart of contradictions/contrasts.	BW	3.50	437.50	JD
Jan-08-21	Emails to/from H. Watson re: various expert issues (.2); confer with H. Watson re: next steps (.2).	BW	0.40	180.00	PJH

	Legal research re: scope and procedure for expert discovery (1.2); email P. Hannon summary of research re: same (1.4); review expert report of Dr. Martin Kelly and defense production of attorney-client redacted emails (.8); research past opinions of Dr. M. Kelly involving diagnoses of Major Depressive Disorder, Panic Disorder, or Social Anxiety Disorder (2.0); emails with L. Menninger re: supplemental production of medical records from Oregon (.4); draft document subpoena of Dr. M. Kelly (.4).	BW	6.20	2,015.00	HW
	Continued review of documents, preparation of timeline and chart.	BW	2.50	312.50	JD
Jan-09-21	Continued review of documents, preparation of timeline and chart.	BW	3.50	437.50	JD
Jan-10-21	Continued review of documents, preparation of timeline and chart.	BW	1.50	187.50	JD
Jan-12-21	Revise draft exhibit attachment for document subpoena to M. Kelly (1.6); legal research re: standards for proper expert rebuttal disclosures under Federal Rules (2.2); draft Expert Rebuttal Disclosure identifying M. Kessimian and A. Burbano (1.4); email opposing counsel re: additional detail requested on M. Kelly past testimony case list (.5); review draft Joint Statement to court re: attorney-client privileged documents sent by opposing counsel (.4).	BW	6.10	1,982.50	HW

Jan-13-21	Draft revised Joint Statement to Court re: attorney-client privileged documents, annotated defense privilege log as proposed attachment to same, and proposed cover email to opposing counsel A. Shaw (.8); review and analyze emails produced by opposing counsel containing redactions for attorney-client privilege and email analysis of likely content and context to P. Hannon (3.2); telephone call with P. Summergrad re: intial reactions to M. Kelly expert report (.7); email I. Gavish documents and detailed instructions re: assignment to chart key facts from medical evidence (1.1).	BW	5.80	1,885.00	HW
Jan-14-21	Email correspondence with P. Summergrad and opposing counsel R. Mandel re: deposition dates for P. Summergrad and format of deposition.	NBW	1.10	0.00	HW
	Completed timeline and chart.	BW	1.00	125.00	JD
Jan-15-21	Attention to PPD's expert disclosure re: damages (.3); email to client re: same (.1).	BW	0.40	180.00	PJH
	Telephone call with I. Gavish re: medical evidence review (.4); review medical evidence received from Deschutes County (.8); read and review	NBW	1.60	0.00	HW



damages expert report of W. Scally (.4).

Jan-18-21	Assist with preparation for medical expert depositions.	BW	1.00	125.00	JD
Jan-20-21	Attention to emails with opposing counsel re: scheduling of P. Summergrad deposition and draft Joint Statement (.2); email task list and items for review to P. Hannon (.2).	NBW	0.40	0.00	HW
Jan-21-21	Email opposing counsel re: P. Summergrad deposition availability.	NBW	0.10	0.00	HW
	Continued preparation for medical expert depositions.	BW	1.20	150.00	JD
Jan-22-21	Telephone call with P. Hannon re: response to opposing counsel re: draft Joint Statement and deposition date discussions for P. Summergrad (.2); email opposing counsel re: same (.1).	NBW	0.30	0.00	HW
	Continued preparation for medical expert depositions.	BW	1.20	150.00	JD
Jan-24-21	Continued preparation for medical expert depositions.	BW	1.50	187.50	JD
Jan-25-21	Email I. Gavish re: research task to locate articles mentioned in M. Kelly expert CV (.3); revise M. Kelly subpoena exhibit to include additional articles (.7); email same to P. Hannon (.2); email L. Menninger re: Oregon records and sending of same to opposing counsel (.5).	NBW	1.80	0.00	HW
	Search/review articles drafted by defense expert.	BW	1.30	162.50	JD

Jan-26-21	Review medical records from Butler Hospital for privilege and prepare Bates stamps (.8); email same to L. Menninger for review (.3); email Mass. Appeals Court and Supreme Judicial Court clerks re: records from cases containing M. Kelly testimony (1.2); review and annotate M. Kelly testimony from two Appeals Court cases and mark for P. Hannon review (1.4); email I. Gavish re: research of M. Kelly publications (.1).	BW	3.80	1,235.00	HW
Jan-27-21	Email opposing counsel re: supplemental disclosure of medical records (.4); email P. Summergrad re: finalization of deposition date (.2).	NBW	0.60	0.00	HW
Jan-28-21	Review and annotate M. Kelly testimony from transcript received from Supreme Judicial Court (3.0); review medical records of M. Kessimian and A. Burbano and revise rebuttal expert disclosures to add factual material supporting anticipated rebuttal opinions (2.0).	BW	5.00	1,625.00	HW
Jan-29-21	Complete edits to revised draft of rebuttal expert disclosures (.7); telephone call with P. Hannon re: logistics for P. Summergrad deposition and associated preparation (.5); email P. Summergrad re: scheduling deposition date and preparation sessions and calendar same (.4).	BW	1.60	520.00	HW
	Continued preparation for medical expert depositions.	BW	1.50	187.50	JD
Jan-31-21	Email trial transcript of Dr. Martin Kelly past	NBW	1.40	0.00	HW

testimony on depression to P.  
Hannon with analysis (.5); legal  
research on qualifying mood  
impairments under ADA  
regulations (.4); emails with P.  
Summergrad re: deposition  
preparation session scheduling  
(.2); review P. Hannon email  
comments to M. Kelly testimony  
(.2); email correspondence with I.  
Gavish re: medical evidence  
review project (.1).

Totals	61.80	\$13,517.50
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P J H	Total Hrs Billed 2.90	Rate \$450.00	Total Fees \$1,305.00
H W	Total Hrs Billed 37.50	Rate \$260.00	Total Fees \$9,750.00
J D	Total Hrs Billed 19.70	Rate \$125.00	Total Fees \$2,462.50

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Jan-15-21	Hosted data	200.00
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Totals	\$200.00
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<b>Total Fee &amp; Disbursements</b>	<b>\$13,717.50</b>
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<b>Balance Now Due</b>	<b>\$13,717.50</b>
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

March 26, 2021

**Attention:**

File #: 43121-003

Inv #: 31326

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Feb-01-21	Email correspondence with Social Library re: copy of M. Kelly testimony transcript from past case.	BW	0.30	97.50	HW
Feb-03-21	Review medical evidence summary by I. Gavish (.6); attention to emails from opposing counsel A. Shaw (.3); draft response to A. Shaw email re: responsive documents to M. Kelly subpoena (.3); review past published work of M. Kelly delivered in response to subpoena (.6); email correspondence with P. Hannon (.3).	BW	2.10	682.50	HW
Feb-04-21	Attention to delivery of transcript of M. Kelly past testimony (.1); email SJC Clerk's Office clerk T. Lok re: third requested transcript (.2).	BW	0.30	97.50	HW
Feb-05-21	Read and annotate past testimony of M. Kelly from	BW	2.60	845.00	HW

Gaboriault case sent by SJC (1.6); telephone call with P. Hannon re: preparation for M. Kelly deposition (.3); review and respond to email from opposing counsel A. Shaw re: document request in M. Kelly subpoena (.2); review supplemental privilege log and draft Joint Statement to court re: documents produced after Motion to Compel with redactions for attorney-client privilege (.5).

Feb-07-21	Draft initial sketch of questions and supporting medical and record evidence for M. Kelly deposition.	BW	2.30	747.50	HW
Feb-08-21	Confer with H. Watson re: preparation for M. Kelly deposition.	BW	1.00	450.00	PJH
	Telephone call with P. Hannon re: strategy and approach for M. Kelly deposition, comments to preparatory outline, and response to opposing counsel re: proposed Joint Statement to court (1.0); initial drafting of revised outline (.8).	BW	1.80	585.00	HW
Feb-09-21	Prepare for M. Kelly deposition (2.9); confer with H. Watson re: same (.3).	BW	3.20	1,440.00	PJH
	Preparation of revised outline of questions and lines of inquiry and supporting evidence from record and medical literature for M. Kelly deposition (4.5); preparation of printed, highlighted and tabbed exhibits for reference by P. Hannon during deposition (1.5); legal research re: information required to be provided on privilege log (1.0); email opposing	BW	7.50	2,437.50	HW

counsel re: supplemental  
privilege log and requested  
clarification re: April 3, 2018  
email from D. Ballweg (.5).

Feb-10-21	Conduct deposition of M. Kelly (7.0); prepare for same (1.2).	BW	8.20	3,690.00	PJH
	Complete revised preparatory outline of questions and evidence, and tabbed printed evidentiary items, for M. Kelly deposition and deliver same to P. Hannon (2.0); discussion with P. Hannon of strategy and goals for deposition (.4); prepare deposition exhibits and distribute same to court reporter and opposing counsel (.4); attention to email from A. Shaw re: follow-up questions on M. Kelly subpoena (.3).	BW	3.10	1,007.50	HW
	Attend deposition of M. Kelly and assist P. Hannon with exhibits and question list for same. [No Charge]	BW	7.10	0.00	HW
Feb-12-21	Telephone call with P. Hannon re: next steps for P. Summergrad deposition preparation, response to opposing counsel re: proposed Joint Statement to court, and rebuttal expert disclosures.	BW	0.20	65.00	HW
Feb-15-21	Review Defendant's Privilege Log, draft Joint Statement to Court, supplemental Privilege Log, and email correspondence with opposing counsel A. Shaw re: filing of Joint Statement (1.2); revise comments to draft Joint Statement and circulate same with proposed exhibit of annotated Privilege	BW	1.70	552.50	HW

Log to opposing counsel for review (.5).

Feb-16-21	Conference with P. Menninger re: deposition preparation (1.9); prepare for same (.5).	BW	2.40	1,080.00	PJH
	Email notes from M. Kelly deposition re: questions to prepare P. Summergrad to answer to P. Hannon (.4); attend Zoom deposition preparation session with P. Hannon and P. Summergrad (1.9).	BW	2.30	747.50	HW
Feb-17-21	Attention to correspondence with opposing counsel A. Shaw re: filing Joint Statement.	BW	0.10	32.50	HW
Feb-19-21	Confer with P. Summergrad re: deposition preparation (2.4); prepare for same (1.0).	BW	3.40	1,530.00	PJH
	Legal research re: discoverability of notes taken by testifying expert witness and scope of permissible discovery and questioning regarding attorney-expert communications and prior drafts of expert reports under Federal Rules of Civil Procedure (.6); email memorandum of research to P. Hannon (.4).	BW	1.00	325.00	HW
	Attendance at deposition preparation session with P. Hannon and P. Summergrad via Zoom. [No Charge]	BW	2.30	0.00	HW
Feb-22-21	Email correspondence with P. Summergrad (.2); telephone call with P. Hannon re: preparation for deposition (.3); preparation for final preparatory session with	BW	1.00	325.00	HW

P. Summergrad before deposition (.5).

Feb-23-21	Defend deposition of P. Summergrad (6.3); confer with witness re: same (1.0).	BW	7.30	3,285.00	PJH
	Prepare notes for P. Summergrad re: objections and privilege issues for deposition (.8); preparatory session with P. Summergrad and P. Hannon via Zoom (1.0); conference with P. Hannon re: deposition debrief and next steps (.7).	BW	2.50	812.50	HW
	Attend deposition of P. Summergrad. [No Charge]	BW	4.80	0.00	HW
	Totals		68.50	\$20,835.00	

PJH	Total Hrs Billed	25.50	Rate	\$450.00	Total Fees	\$11,475.00
H W	Total Hrs Billed	43.00	Rate	\$217.67	Total Fees	\$9,360.00

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Feb-05-21	Medical records	52.50
Feb-11-21	Hosted data	200.00
	Totals	\$252.50
	<b>Total Fee &amp; Disbursements</b>	<b>\$21,087.50</b>
	<b>Balance Now Due</b>	<b>\$21,087.50</b>

TAX ID Number 13-4299300



***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

April 14, 2021

**Attention:**

File #: 43121-003

Inv #: 31431

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Mar-14-21	Email correspondence with P. Summergrad re: errata sheet for deposition transcript.	BW	0.20	65.00	HW
Mar-24-21	Review/analyze motion for summary judgment (.6); confer with client re: same (.4); email to H. Watson re: same and strategy (.2).	BW	1.20	540.00	PJH
Mar-25-21	Review and annotate Defendant's Motion for Summary Judgment and Statement of Facts (2.3); email correspondence with P. Hannon re: initial reactions to Motion (.3).	BW	2.60	845.00	HW
Mar-26-21	Confer with H. Watson re: SJ opposition and strategy related thereto.	BW	0.50	225.00	PJH
	Telephone call with P. Hannon re: strategy and plan for preparation of opposition to Motion for Summary Judgment (.5); review sample	BW	2.40	780.00	HW

motion to strike sent by P. Hannon in preparation for potential evidentiary arguments to raise in response to Motion for Summary Judgment (.5); email assignments and thoughts to law clerk I. Gavish re: inconsistencies between factual positions in Motion to Compel and Motion for Summary Judgment and review of Statement of Facts to identify disputed and undisputed statements (1.4).

Mar-29-21	Review Order of Court directing in camera review (.3); email I. Gavish re: factual review assignments (.4); review I Gavish comments to Defendant's Statement of Facts (.2); legal research re: adverse action for retaliation claim, request for accommodation as protected activity, and legal standard for proving job responsibility is essential (.9).	BW	1.80	585.00	HW
	Analyze and annotate defendant's statement of facts.	BW	6.00	750.00	JD
Mar-30-21	Prewriting and outlining of arguments and topics for legal research for Opposition to Motion for Summary Judgment (1.5); legal research re: standard for demonstrating job function is essential on failure to accommodate claim and standard for showing adverse action for retaliation claim under ADA and Chapter 151B (4.0).	BW	5.50	1,787.50	HW
Mar-31-21	Legal research re: adverse action element of retaliation claims under the ADA and	BW	6.60	2,145.00	HW

Chapter 151B and burden and standards for demonstrating the essential functions of a job and employee's ability to perform same (4.2); outlining of arguments on foregoing issues (1.3); strategic planning of arguments for Opposition to Motion for Summary Judgment (1.1).

Totals	26.80	\$7,722.50
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P J H	Total Hrs Billed 1.70	Rate \$450.00	Total Fees \$765.00
H W	Total Hrs Billed 19.10	Rate \$325.00	Total Fees \$6,207.50
J D	Total Hrs Billed 6.00	Rate \$125.00	Total Fees \$750.00

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Mar-05-21	Butler Hospital refund	-52.50
	Social Law Library copy charges	140.80
Mar-10-21	Hosted data	200.00
	Courier Social Law Library	20.00
Mar-24-21	Deposition transcript Dr. Martin Kelly	841.35
	Totals	\$1,149.65

<b>Total Fee &amp; Disbursements</b>	<b>\$8,872.15</b>
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<b>Balance Now Due</b>	<b>\$8,872.15</b>
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

June 1, 2021

**Attention:**

File #: 43121-003

Inv #: 31615

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Apr-01-21	Conference with P. Hannon re: strategy and arguments on adverse action element of retaliation claim and issue re: essential functions of job under failure to accommodate claim in preparation for Opposition to Motion for Summary Judgment (.7); review Standing Orders of Judge L. Sorokin re: summary judgment (.4); initial preparation of exhibit list to present with Statement of Facts (2.2); review and annotate affidavits submitted by Defendant along with Motion for Summary Judgment (1.1).	BW	4.40	715.00	HW
Apr-02-21	Attention to Exhibit List for Statement of Facts (.8); review and annotate affidavits of C. St-John and C. Fikry re: issues to dispute and evidentiary issues to raise (1.6).	BW	2.40	390.00	HW
Apr-05-21	Review and annotate P. Summergrad deposition (.8); legal	NBW	1.10	0.00	HW

research re: ability of deponent to make substantive changes in errata sheet (.3).

Apr-06-21	Attention to Summergrad errata sheet (.2); confer with H. Watson re: status and strategy (.2).	BW	0.40	90.00	PJH
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Complete review of P. Summergrad deposition transcript and errata sheet (3.4); telephone call with P. Hannon re: timing of Opposition to Summary Judgment and P. Summergrad errata sheet (.2); email P. Summergrad re: comments to errata sheet (.1); draft Motion for Extension of deadline to respond to Motion for Summary Judgment (.3); email opposing counsel re: position on relief requested in Motion for Extension (.2).

NBW	4.20	0.00	HW
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Apr-07-21	Attention to email correspondence with opposing counsel re: Motion of Extension of Deadline to Respond to Motion for Summary Judgment (.3); prepare final version of Motion for Extension and file same (.4).	NBW	0.70	0.00	HW
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Apr-08-21	Complete review and annotation of Defendant's affidavits and supporting exhibits filed with Motion for Summary Judgment (2.9); drafting of Response to Defendant's Statement of Material Facts (4.0).	BW	6.90	1,121.25	HW
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Review document production for evidence concerning tasks 2-4 for use in summary judgment opposition.

BW	5.50	343.75	JD
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Apr-09-21	Drafting of Response to	BW	5.50	893.75	HW
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Defendant's Statement of Material Facts and associated review and annotation of opposing affidavits and exhibits, deposition transcripts, and documentary evidence exchanged in discovery.

	Continued review document production for evidence concerning tasks 2-4 for use in summary judgment opposition.	BW	0.50	31.25	JD
Apr-11-21	Continued review document production for evidence concerning tasks 2-4 for use in summary judgment opposition.	BW	1.00	62.50	JD
Apr-12-21	Drafting of Response to Defendant's Statement of Material Facts (5.8); associated review and annotation of documentary evidence and deposition transcripts (3.2).	BW	9.00	1,462.50	HW
	Continued review document production for evidence concerning tasks 2-4 for use in summary judgment opposition.	BW	0.50	31.25	JD
Apr-13-21	Confer with H. Watson re: strategy.	NBW	0.70	0.00	PJH
	Drafting of response to Defendant's Statement of Material Facts (5.4); associated review and annotation of depositions and discovery production (2.7); email correspondence with I. Gavish re: factual overview assistance (.5).	BW	8.60	1,397.50	HW
	Continued review document production for evidence concerning tasks 2-4 for use in summary judgment opposition.	BW	3.25	203.13	JD

Apr-14-21	Drafting of Responses to Defendant's Statement of Material Facts and associated review and annotation of transcripts, exhibits to Motion for Summary Judgment, and discovery production (9.2); review Order on Motion to Compel (.3); email P. Hannon re: conferring with opposing counsel re: outstanding email referred to in Order (.5).	BW	10.00	1,625.00	HW
Apr-15-21	Attention to order on motion to compel (.1); email to client re: same (.1); email to opposing counsel re: outstanding issue noted in footnote (.1).	BW	0.30	67.50	PJH
	Complete first draft of Response to Defendant's Statement of Material Facts (5.1); telephone calls and email correspondence with law clerk I. Gavish re: factual assistance (2.2).	BW	7.30	1,186.25	HW
	Assist H. Watson with response to SOF.	BW	5.50	343.75	JD
Apr-16-21	Review and annotate Defendant's production of emails pursuant to Order on Motion to Compel.	NBW	0.90	0.00	HW
Apr-19-21	Attention to emails produced per motion to compel (.3); email to client re: same (.2).	BW	0.50	112.50	PJH
Apr-20-21	Prewriting and initial drafting of Plaintiff's Statement of Additional Material Facts (4.2); email correspondence with I. Gavish re: factual assistance for same (2.9); conference with P. Hannon re: Statement of Additional Facts, production	BW	7.70	1,251.25	HW

from Motion to Compel, and Joint Request for Clarification (.6).

	Assist H. Watson with SAMF.	BW	4.75	296.88	JD
Apr-21-21	Confer with client re: status.	BW	0.20	45.00	PJH
	Drafting of Plaintiff's Statement of Additional Material Facts.	NBW	3.30	0.00	HW
Apr-22-21	Drafting of Plaintiff's Statement of Additional Material Facts.	BW	5.50	893.75	HW
Apr-23-21	Drafting of Plaintiff's Statement of Additional Material Facts (6.9); telephone call with L. Menninger re: factual questions (.8); attention to email correspondence re: expert witness invoices (.3).	BW	8.00	1,300.00	HW
Apr-24-21	Complete first draft of Plaintiff's Statement of Material Facts.	BW	9.00	1,462.50	HW
Apr-26-21	Outline Memorandum in Opposition to Defendant's Motion for Summary Judgment (6.3); telephone call with L. Menninger re: factual disputes for Motion for Summary Judgment (1.1).	BW	7.40	1,202.50	HW
Apr-27-21	Drafting of sections of Opposition to Motion for Summary Judgment re: essential functions, standard of review, retaliation, and purpose of ADA.	BW	9.90	1,608.75	HW
Apr-28-21	Drafting of failure to accommodate and retaliation sections of Memorandum in Opposition to Motion for	BW	13.30	2,161.25	HW



Summary Judgment (9.8);  
associated legal research and  
factual review (3.5).

Apr-29-21	Complete first draft of Memorandum in Opposition to Motion for Summary Judgment (8.0); telephone call and email correspondence with I. Gavish re: creation of Plaintiff's exhibits and proofreading of Response to Defendant's Statement of Material Facts and Statement of Additional Material Facts (.7).	BW	8.70	1,413.75	HW
	Assist H. Watson with preparation of exhibits. [No Charge]	NBW	7.00	0.00	JD
Apr-30-21	Legal research, outlining, and drafting of Motion to Strike (6.8); email correspondence with M. Michon re: preparation of Table of Contents for exhibits to be filed in opposition to Motion for Summary Judgment (.4).	BW	7.20	1,170.00	HW

Totals	171.10	\$22,882.51
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PJH	Total Hrs Billed 2.10	Rate \$150.00	Total Fees \$315.00
H W	Total Hrs Billed 141.00	Rate \$150.74	Total Fees \$21,255.00
JD	Total Hrs Billed 28.00	Rate \$46.88	Total Fees \$1,312.51

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Apr-01-21	Paul Summergrad transcript	898.50
Apr-15-21	Hosted data	200.00
	Totals	\$1,098.50

**Total Fee & Disbursements**

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**\$23,981.01**

**Balance Now Due**

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**\$23,981.01**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

June 18, 2021

<b>Attention:</b>	File #:	43121-003
	Inv #:	31722

**RE:** Litigation - Pharmaceutical Product Development

<b>DATE</b>	<b>DESCRIPTION</b>		<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
May-03-21	Revise Plaintiff's Responses to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Facts (3.0); telephone call with P. Hannon re: coordination for preparation of filings for Opposition to summary judgment (.6); email I. Gavish and M. Michon re: preparation of Table of Contents of Exhibits and draft affidavit (.4); complete draft of Motion to Strike (1.5).	BW	5.50	893.75	HW
	Assist with drafting client Affidavit.	BW	5.10	318.75	JD
May-04-21	Begin revision of response to statement of facts.	BW	3.40	765.00	PJH
	Continued revisions to Plaintiff's Responses to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts (4.8); cite-checking of same (1.9); revise and update	BW	10.70	1,738.75	HW

Motion to Strike and email S. Han re: assistance with same (.4); revise draft of Menninger Affidavit (1.8); email same to L. Menninger for review and input L. Menninger comments (.3); email opposing counsel re: consent for Motion to Impound (.2); prepare authenticating Declaration of P. Summergrad and email P. Summergrad re: execution of same (.6); email I. Gavish re: list of documents to redact prior to filing Opposition (.7).

Assist with exhibit preparation for summary judgment opposition.

BW

5.50

343.75

JD

Conference with H. Watson (.1); research cites for Sham Affidavit Rule (.2); edit Motion To Strike (1.9).

BW

2.20

302.50

SH

May-05-21

Complete revision of response to Defendant's statement of facts (4.1); begin revising affirmative statement of facts; revise client affidavit (2.4).

BW

6.50

1,462.50

PJH

Revisions to Plaintiff's Response to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts (7.5); email and telephone correspondence with S. Han re: cite-checking of same (.3); telephone call with L. Menninger re: factual questions for Affidavit (.8); revise and update Affidavit, email same to L. Menninger for review and input L. Menninger comments (2.7); email M. Michon and I. Gavish re: listing of documents to redact

BW

13.10

2,128.75

HW

when filing Opposition and completion of Table of Contents for exhibits (1.1); draft Declaration of P. Hannon to authenticate exhibits (.5); revise and update Motion to Impound (.2).

Preparation of exhibits.	BW	4.50	281.25	MMM
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Continue assisting with exhibit preparation.	BW	3.00	187.50	JD
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Conference with H. Watson (.3); edit Opposition to Motion for Summary Judgment Statement of Facts re: Exhibit citations (6.5).	BW	6.80	935.00	SH
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Draft P. Hannon Declaration re Exhibits (1.1); draft list of redacted facts and Exhibits (1.4).	BW	2.50	343.75	SH
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May-06-21	Revise statement of additional facts (3.3); revise opposition brief (3.5); conferences with H. Watson re: same (.8).	BW	7.60	1,710.00	PJH
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Telephone call with P. Hannon re: comments to brief and tasks for completion (.8); revise Memorandum in Opposition to Motion for Summary Judgment (5.0); email S. Han re: assistance with legal research and filing of Plaintiff's Responses to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts and Exhibits thereto (.4); email M. Michon to coordinate redaction of exhibits and Plaintiff's Responses to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts (.8); assembly and	BW	9.00	1,462.50	HW
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filing of final versions of Memorandum, Plaintiff's Responses to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts with Exhibits (1.5); Motion to Impound, and Motion to Strike (.5).

Conference with H. Watson (.3); research judicial estoppel to ADA claim; edit Opposition to Motion for Summary Judgment (1.4); attention to electronic filing rules re: max file size (.3).

BW

2.00

275.00

SH

Electronic filing of Opposition to Motion for Summary Judgment.

BW

2.00

275.00

SH

May-07-21

Assembly and email of unredacted copies of Plaintiff's Responses to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts and exhibits thereto to be filed under seal pursuant to granted Motion to Impound (.8); email and telephone correspondence with M. Michon re: assistance with same (.4); email opposing counsel and law clerk for Court re: corrected version of Plaintiff's Responses to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts with additional redactions pursuant to Protective Order (.4); prepare unredacted packet of Plaintiff's Responses to Defendant's Statement of Material Facts and Plaintiff's Statement of Additional Material Facts and all exhibits thereto for creation of physical courtesy copy of

BW

3.90

633.75

HW

same for Court pursuant to Standing Order of Sorokin, J. re: Summary Judgment (1.8); email and telephone correspondence with M. Michon re: assistance with same (.5).

May-11-21	Email correspondence with I. Gavish re: preparation of courtesy copy binder for delivery to District Court and firm (.3); conference with P. Hannon re: outstanding cleanup tasks from filing of Opposition to Motion for Summary Judgment (.3).	BW	0.60	97.50	HW
	Continue assisting with exhibit preparation.	BW	2.50	156.25	JD
May-12-21	Email correspondence with opposing counsel re: deadline for reply to Opposition to Motion for Summary Judgment and service of unredacted files from Opposition (.3); contact docket clerk re: request to correct file to add redactions to Plaintiff's Statement of Additional Material Facts (.4); order printed binders of courtesy copy of Plaintiff's Response to Defendant's Statement of Material Facts and Statement of Additional Material Facts (.3); telephone call with P. Leary of Key Discovery re: logistics for delivery of courtesy copy to Court (.3).	BW	1.30	211.25	HW
May-17-21	Review email from L. Menninger re: [REDACTED] (.2); review defendant's discovery requests (.2); email P. Hannon re: next steps (.1).	BW	0.50	81.25	HW

May-18-21	Email and telephone call with B. Robb re: [REDACTED] (.3); telephone call with L. Menninger re: Defendant's request for extension for Reply and other responses (.3); email opposing counsel re: extension (.2).	BW	0.80	130.00	HW
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May-28-21	Conference with P. Hannon re: upcoming Reply/Response to Motion for Summary Judgment and supplemental document disclosures to Defendant.	BW	0.10	16.25	HW
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Totals	99.10	\$14,750.00
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P J H	Total Hrs Billed 17.50	Rate \$225.00	Total Fees \$3,937.50
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H W	Total Hrs Billed 45.50	Rate \$162.50	Total Fees \$7,393.75
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M M M	Total Hrs Billed 4.50	Rate \$62.50	Total Fees \$281.25
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J D	Total Hrs Billed 16.10	Rate \$62.50	Total Fees \$1,006.25
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S H	Total Hrs Billed 15.50	Rate \$137.50	Total Fees \$2,131.25
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

May-06-21	Hosted data	200.00
May-20-21	Copy Service	1,144.52

Totals	\$1,344.52
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<b>Total Fee &amp; Disbursements</b>	<b>\$16,094.52</b>
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<b>Balance Now Due</b>	<b>\$16,094.52</b>
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TAX ID Number 13-4299300



***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

July 26, 2021

**Attention:**

File #: 43121-003

Inv #: 31838

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jun-16-21	Review MSJ reply brief (.5); email to client re: same (.1).	BW	0.60	135.00	PJH
	Review Defendant's Reply in support of Motion for Summary Judgment and accompanying filings (1.1); email P. Hannon comments re: benefits or drawbacks of seeking leave to further respond (.6).	BW	1.70	276.25	HW
Jun-23-21	Email L. Menninger re: acquisition of PPD.	BW	0.20	32.50	HW
	Totals		2.50	\$443.75	
PJH	Total Hrs Billed 0.60	Rate	\$225.00	Total Fees	\$135.00
H W	Total Hrs Billed 1.90	Rate	\$162.50	Total Fees	\$308.75

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Jun-10-21 Hosted data 150.00

Totals

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\$150.00

**Total Fee & Disbursements**

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**\$593.75**

**Balance Now Due**

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**\$593.75**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***

155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

August 31, 2021

**Attention:**

File #: 43121-003

Inv #: 31974

**RE:** Litigation - Pharmaceutical Product Development

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Jul-08-21	Hosted data	150.00
	Totals	<hr/> \$150.00
	<b>Total Fee &amp; Disbursements</b>	<hr/> <b>\$150.00</b>
	<b>Balance Now Due</b>	<hr/> <b>\$150.00</b>

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

October 8, 2021

**Attention:**

File #: 43121-003

Inv #: 32185

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Aug-05-21	Attention to email from P. Hannon re: damages issue under state disability discrimination law (.2); email P. Hannon re: Federal Rules applicable to disclosure of experts not specially retained (.3).	BW	0.50	81.25	HW
Aug-30-21	Attention to email re: expert witness payment (.1); discuss same with P. Hannon (.1).	BW	0.20	32.50	HW
	Totals		0.70	\$113.75	
H W	Total Hrs Billed 0.70	Rate \$162.50	Total Fees	\$113.75	

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Aug-12-21	Hosted data	150.00
	Totals	\$150.00
	<b>Total Fee &amp; Disbursements</b>	<b>\$263.75</b>

**Balance Now Due**

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**\$263.75**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

November 18, 2021

**Attention:**

File #: 43121-003

Inv #: 32371

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Oct-28-21	Review news article and court docket filings re: retaliatory termination trial before Judge L. Sorokin in U.S. District Court for District of Massachusetts (.3); email P. Hannon re: same (.2).	BW	0.50	81.25	HW

Totals

0.50

\$81.25

H W	Total Hrs Billed	0.50	Rate	\$162.50	Total Fees	\$81.25
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Sep-16-21	Hosted data	150.00
Oct-21-21	Hosted data	150.00
Totals		\$300.00

**Total Fee & Disbursements****\$381.25****Balance Now Due****\$381.25**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***

155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

December 15, 2021

**Attention:**

File #: 43121-003

Inv #: 32599

**RE:** Litigation - Pharmaceutical Product Development

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Nov-10-21	Hosted data	150.00
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	Totals	<hr/> \$150.00
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	<b>Total Fee &amp; Disbursements</b>	<hr/> <b>\$150.00</b>
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	<b>Balance Now Due</b>	<hr/> <b>\$150.00</b>
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TAX ID Number 13-4299300



***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

February 28, 2022

**Attention:**

File #: 43121-003

Inv #: 32845

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jan-18-22	Emails to/from client re: status and next steps.	BW	0.60	135.00	PJH
	Totals		0.60	\$135.00	
PJH	Total Hrs Billed 0.60	Rate \$225.00	Total Fees	\$135.00	

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Dec-15-21	Hosted data	150.00
Jan-13-22	Hosted data	150.00
	Totals	\$300.00

**Total Fee & Disbursements****\$435.00****Balance Now Due****\$435.00**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

March 29, 2022

**Attention:**

File #: 43121-003

Inv #: 32978

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Feb-10-22	Attention to order setting hearing (.2); email to client re: same (.1).	BW	0.30	67.50	PJH
	Attention to Court order setting oral argument (.1); review motion for continuance of oral argument submitted for review by opposing counsel R. Mandel (.1); email P. Hannon re: Massachusetts Commission Against Discrimination recent authority on failure to accommodate claims (.1).	BW	0.30	48.75	HW
	Totals		0.60	\$116.25	

PJH	Total Hrs Billed	0.30	Rate	\$225.00	Total Fees	\$67.50
H W	Total Hrs Billed	0.30	Rate	\$162.50	Total Fees	\$48.75

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Feb-10-22	Hosted data	150.00
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Totals

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\$150.00

**Total Fee & Disbursements**

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**\$266.25**

**Balance Now Due**

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**\$266.25**

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

April 21, 2022

**Attention:**

File #: 43121-003

Inv #: 33094

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Mar-02-22	Confer with P. Hannon re: upcoming oral argument on Motion for Summary Judgment.	BW	0.10	16.25	HW
Mar-08-22	Prepare for and attend hearing on motion for summary judgment.	BW	4.50	1,012.50	PJH
	Attendance at oral argument on Motion for Summary Judgment (1.2); review of briefs and statements and responses of material facts in preparation for same (1.8).	BW	3.00	487.50	HW
Mar-22-22	Review/analyze order on motion for summary judgment (.8); confer with H. Watson re: same (.3); confer with client re: same (.4).	BW	1.50	337.50	PJH
	Review Order of Court on Motion for Summary Judgment (1.9); draft chart of opinion and claims and arguments remaining for trial (2.2);	BW	4.60	747.50	HW

email P. Hannon re: same and  
analysis of legal issues relating to  
Court's Order and remaining  
claims (.5).

Mar-23-22	Attention to emails re: trial length and scheduling.	BW	0.20	45.00	PJH
Mar-24-22	Attention to emails re: trial scheduling.	BW	0.20	45.00	PJH
Mar-29-22	Attention to emails re: trial scheduling.	BW	0.20	45.00	PJH
Totals			14.30	\$2,736.25	

PJH	Total Hrs Billed	6.60	Rate	\$225.00	Total Fees	\$1,485.00
H W	Total Hrs Billed	7.70	Rate	\$162.50	Total Fees	\$1,251.25

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Mar-09-22	Hosted data	150.00	
Totals		\$150.00	
Total Fee & Disbursements			\$2,886.25
Balance Now Due			\$2,886.25

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

May 31, 2022

**Attention:**

File #: 43121-003

Inv #: 33249

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Apr-04-22	Emails to/from opposing counsel re: mediation and trial schedule.	BW	0.30	67.50	PJH
Apr-05-22	Attention to joint status report.	BW	0.30	67.50	PJH
Apr-06-22	Conference with P. Hannon re: upcoming scheduling conference to set trial dates (.6); email correspondence with expert witnesses P. Summergrad and B. Jonas re: trial availability (.4).	BW	1.00	162.50	HW
Apr-08-22	Attention to email correspondence with Court clerk K. Belmont re: scheduling of scheduling conference re: trial dates (.2); email correspondence with damages expert B. Jonas re: availability for trial (.2).	BW	0.40	65.00	HW
Apr-11-22	Email opposing counsel R. Mandel re: scheduling conference hearing.	BW	0.10	16.25	HW

Apr-12-22	Appear for plaintiff at status conference with court re: trial dates (.5); preparation for same (.3); telephone calls with P. Hannon re: same (.3); email L. Menninger re: recap of same (.3).	BW	1.40	227.50	HW
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Apr-13-22	Emails to/from client re: status and next steps.	BW	0.30	67.50	PJH
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Totals			3.80	<u>673.75</u>	
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PJH	Total Hrs Billed	0.90	Rate	\$225.00	Total Fees	\$202.50
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H W	Total Hrs Billed	2.90	Rate	\$162.50	Total Fees	\$471.25
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Apr-08-22	Hosted data			150.00	
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Totals				<u>150.00</u>	
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<b>Total Fee &amp; Disbursements</b>					<u><b>\$823.75</b></u>
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<b>Balance Now Due</b>					<u><b>\$823.75</b></u>
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

June 15, 2022

**Attention:**

File #: 43121-003

Inv #: 33356

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
May-09-22	Conference with P. Hannon re: next steps (.4); initial prewriting for Motion for Reconsideration on failure to accommodate issue (.4).	BW	0.80	130.00	HW
May-10-22	Outlining and drafting of Motion for Reconsideration re: interactive process.	BW	4.90	796.25	HW
May-11-22	Drafting of Motion for Reconsideration re: interactive process.	BW	1.50	243.75	HW
May-13-22	Drafting of Memorandum in support of Motion for Reconsideration on interactive process claim.	BW	2.40	390.00	HW
May-16-22	Confer with client re: status and next steps.	BW	0.20	45.00	PJH
	Drafting of Memorandum in support of Motion for Reconsideration on interactive process claim.	BW	4.30	698.75	HW



May-17-22	Complete drafting of Motion for Reconsideration on interactive process claim (6.7); revise and proofread same (2.4); email same to P. Hannon with comments for review (.2).	BW	9.30	1,511.25	HW
May-23-22	Attend status conference with Court re: trial dates.	BW	0.30	48.75	HW
	Totals		23.70	<u>\$3,863.75</u>	

P J H	Total Hrs Billed	0.20	Rate	\$225.00	Total Fees	\$45.00
H W	Total Hrs Billed	23.50	Rate	\$162.50	Total Fees	\$3,818.75

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

May-12-22		150.00
	Totals	<u>\$150.00</u>
	<b>Total Fee &amp; Disbursements</b>	<u><b>\$4,013.75</b></u>
	<b>Balance Now Due</b>	<u><b>\$4,013.75</b></u>

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

August 22, 2022

**Attention:**

File #: 43121-003

Inv #: 33661

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jul-05-22	Attention to emails and docket re: confirmation of trial date (.2); email P. Hannon re: same (.1).	BW	0.30	48.75	HW
Jul-12-22	Confer with client re: status and strategy.	BW	0.60	135.00	PJH
Jul-14-22	Telephone call with P. Hannon re: status and next steps for pretrial matters including discovery and Motion for Reconsideration.	BW	0.10	16.25	HW
Jul-28-22	Email expert witnesses B. Jonas and P. Summergrad re: trial date confirmation.	BW	0.30	48.75	HW
Jul-29-22	Telephone call with P. Hannon re: next steps for potential additional pretrial discovery and strategy for medical expert witnesses.	BW	0.20	32.50	HW

Totals

1.50

\$281.25

PJH

Total Hrs 0.60  
Billed

Rate \$225.00

Total Fees \$135.00

H W	Total Hrs Billed	0.90	Rate	\$162.50	Total Fees	\$146.25
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**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Jul-13-22	Hosted Data	150.00	
	Totals	<hr/>	\$150.00
	<b>Total Fee &amp; Disbursements</b>		<hr/> <b>\$431.25</b>
		<b>Balance Now Due</b>	<hr/> <b>\$431.25</b>

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

October 18, 2022

**Attention:**

File #: 43121-003

Inv #: 33921

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Aug-01-22	Review of client files and SEC filings of PPD and Thermo Fisher re: equity component of damages in preparation for drafting of supplemental discovery request.	BW	2.00	325.00	HW
Aug-02-22	Prewriting and drafting of supplemental interrogatories re: damages in light of PPD acquisition by Thermo Fisher.	BW	1.70	276.25	HW
Aug-03-22	Complete draft of supplemental interrogatories re: damages (4.0); review of SEC documents and documents previously produced in discovery re: equity losses to aid in drafting of same (2.0); email draft supplemental interrogatories to P. Hannon with comments for review (.4).	BW	6.40	1,040.00	HW
Sep-08-22	Revise draft supplemental interrogatories and email same to P. Hannon (3.0); conference with P. Hannon re: supplemental	BW	3.60	585.00	HW

disclosure received from  
Defendant and next steps (.6).

Sep-12-22	Confer with opposing counsel re: settlement.	BW	0.20	45.00	PJH
Sep-14-22	Attention to emails re: settlement.	BW	0.20	45.00	PJH
Sep-15-22	Attention to settlement (.2); confer with client and opposing counsel re: same (.2).	BW	0.40	90.00	PJH
Totals			14.50	\$2,406.25	

PJH	Total Hrs Billed	0.80	Rate	\$225.00	Total Fees	\$180.00
H W	Total Hrs Billed	13.70	Rate	\$162.50	Total Fees	\$2,226.25

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Jun-30-22	Hosted Data	150.00
Totals		\$150.00
<b>Total Fee &amp; Disbursements</b>		<b>\$2,556.25</b>
<b>Balance Now Due</b>		<b>\$2,556.25</b>

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

November 15, 2022

**Attention:**

File #: 43121-003

Inv #: 34061

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Oct-05-22	Confer with H. Watson re: status and strategy.	BW	0.30	67.50	PJH
	Telephone call with P. Hannon re: next steps for pretrial preparation including supplementation of expert reports and document disclosures re: medical records.	BW	0.40	65.00	HW
Oct-06-22	Review of expert reports of B. Jonas and P. Summergrad (.6); email correspondence with B. Jonas and P. Summergrad re: potential supplementation of expert reports (.4); telephone call with B. Jonas re: same (.5); email L. Menninger re: supplementation of medical records (.4); attention to Court order setting trial (.3); email M. Michon re: calendaring of pretrial deadlines (.2).	BW	2.40	390.00	HW
Oct-10-22	Email correspondence with L.	BW	0.20	32.50	HW

Menninger re: supplement to  
medical records.

Oct-11-22	Email correspondence with L. Menninger re: supplement to medical records.	BW	0.10	16.25	HW
Oct-17-22	Review medical records provided by L. Menninger for privilege (.6); email L. Menninger re: collection of updated records and potential supplemental review by medical expert P. Summergrad (.4).	BW	1.00	162.50	HW
Oct-19-22	Review additional medical records received from Deschutes County for privilege (1.5); organization of supplemental records (.3); prepare and stamp all supplemental medical records for production and sharing with expert P. Summergrad (.2); draft email to P. Summergrad re: records (.2).	BW	2.20	357.50	HW
Oct-20-22	Confer with H. Watson re: updating expert disclosures (.2); review expert disclosures in connection with same (.3).	BW	0.50	112.50	PJH
	Telephone call with P. Hannon re: supplemental work with medical expert P. Summergrad and damages expert B. Jonas (.6); email P. Summergrad re: updated medical records and review of same (.3); email B. Jonas re: follow-up call (.3); review damages expert reports by B. Jonas and opposing expert B. Scally and email P. Hannon list of points for discussion with B. Jonas (.5).	BW	1.70	276.25	HW
Oct-21-22	Email correspondence with B. Jonas and P. Summergrad re:	BW	0.50	81.25	HW

calls to discuss supplemental  
expert work.

Oct-24-22	Confer with damages expert.	BW	0.30	67.50	PJH
	Telephone call with damages expert B. Jonas and assistant D. Lane and P. Hannon re: potential supplemental expert work.	BW	0.60	97.50	HW
Oct-25-22	Confer with P. Summergard re: updated report.	BW	0.50	112.50	PJH
	Videoconference with P. Summergrad and P. Hannon re: supplemental medical expert work.	BW	0.40	65.00	HW
Oct-26-22	Email correspondence with L. Menninger re: medical records and expert interview with P. Summergrad.	BW	0.20	32.50	HW
Oct-31-22	Initiate videoconference interview between P. Sumemrgrad and L. Menninger.	BW	0.10	16.25	HW

Totals

11.40 \$1,952.50

PJH	Total Hrs Billed 1.60	Rate \$225.00	Total Fees \$360.00
H W	Total Hrs Billed 9.80	Rate \$162.50	Total Fees \$1,592.50

**Total Fee & Disbursements**

**\$1,952.50**

**Balance Now Due**

**\$1,952.50**

TAX ID Number 13-4299300



***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

December 8, 2022

**Attention:**

File #: 43121-003

Inv #: 34173

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Nov-04-22	Email correspondence with P. Summergrad re: follow-up to interview of L. Menninger.	BW	0.30	48.75	HW
Nov-10-22	Confer with opposing counsel re: settlement (.3); email to client re: same (.4).	BW	0.70	157.50	PJH
Nov-11-22	Confer with client re: status and strategy (.5); email to opposing counsel re: response to offer and possible mediation (.2).	BW	0.70	157.50	PJH
	Email correspondence with P. Summergrad to schedule call re: next steps.	BW	0.10	16.25	HW
Nov-17-22	Confer with client re: status.	BW	0.10	22.50	PJH
	Videoconference with P. Summergrad re: drafting of supplemental expert report (.6); prepare exhibits for supplemental expert disclosures and shell draft for supplemental expert report and email P. Summergrad re: same (.6).	BW	1.20	195.00	HW

Nov-18-22	Attention to emails re: mediation scheduling.	BW	0.20	45.00	PJH
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Totals			3.30	\$642.50	
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PJH	Total Hrs Billed	1.70	Rate	\$225.00	Total Fees	\$382.50
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H W	Total Hrs Billed	1.60	Rate	\$162.50	Total Fees	\$260.00
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Total Fee & Disbursements						\$642.50
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Balance Now Due						\$642.50
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

January 30, 2023

**Attention:**

File #: 43121-003

Inv #: 34355

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Dec-07-22	Attention to email from L. Menninger (.2); email P. Summergrad re: status of expert report (.2).	BW	0.40	65.00	HW
Dec-08-22	Email correspondence with L. Menninger re: medical updates and upcoming mediation.	BW	0.30	48.75	HW
Dec-11-22	Attention to email from P. Summergrad.	BW	0.10	16.25	HW
Dec-13-22	Email correspondence with P. Summergrad re: drafting of supplemental medical expert report.	BW	0.20	32.50	HW
Dec-18-22	Email correspondence with P. Summergrad re: timing of expert report.	BW	0.10	16.25	HW
Dec-20-22	Attention to mediation agreement (.2); emails to/from client and opposing counsel re: same (.2).	BW	0.40	90.00	PJH
Dec-29-22	Begin preparations for	BW	1.10	247.50	PJH

upcoming mediation (.4);  
attention to damages calculation  
and potential tax issues (.7).

Totals		2.60	\$516.25	
P J H	Total Hrs Billed 1.50	Rate \$225.00	Total Fees	\$337.50
H W	Total Hrs Billed 1.10	Rate \$162.50	Total Fees	\$178.75
Total Fee & Disbursements				\$516.25
Balance Now Due				\$516.25

TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

February 17, 2023

**Attention:**

File #: 43121-003

Inv #: 34522

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Jan-03-23	Strategize re: mediation and related matters.	BW	1.00	225.00	PJH
	Attention to Supplemental Expert Report for P. Summergrad.	BW	2.50	406.25	HW
Jan-04-23	Review and comment on draft expert report received from P. Summergrad (.5); telephone call with P. Hannon re: same (.5); email P. Summergrad re: follow-up on same (.2).	BW	1.20	195.00	HW
Jan-05-23	Videoconference with P. Summergrad (.6); conference with P. Hannon (.8); comment on draft Supplemental Expert Report and email same to P. Hannon for review (1.4).	BW	2.80	455.00	HW
Jan-06-23	Confer with client re: mediation and related matters (.4); prepare and send materials for mediator review (1.4); confer with mediator re: same and case background (.4).	BW	2.20	495.00	PJH

Jan-11-23	Attention to emails re: mediation scheduling.	BW	0.20	45.00	PJH
Jan-18-23	Conference with P. Hannon re: draft supplemental expert disclosure.	BW	0.20	32.50	HW
Jan-19-23	Comment on draft of Supplemental Expert Report of P. Summergrad and email same to P. Summergrad for review (.6); email supplemental disclosure of medical records to opposing counsel R. Mandel (.4).	BW	1.00	162.50	HW
Jan-26-23	Confer with client re: status and strategy.	BW	0.40	90.00	PJH
Jan-30-23	Prepare for and attend mediation (3.1); conference with client re: status and next steps (.6); strategize re: pretrial planning (.5).	BW	4.20	945.00	PJH

Totals	15.70	\$3,051.25
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PJH	Total Hrs Billed	8.00	Rate	\$225.00	Total Fees	\$1,800.00
H W	Total Hrs Billed	7.70	Rate	\$162.50	Total Fees	\$1,251.25

Total Fee & Disbursements	\$3,051.25
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Balance Now Due	\$3,051.25
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TAX ID Number 13-4299300

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph:617-723-8000

Fax:617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

April 5, 2023

**Attention:**File #: 43121-003  
Inv #: 34683**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Feb-08-23	Attention to email from staff for opposing counsel re: deposition exhibits.	BW	0.10	16.25	HW
Feb-10-23	Review court's summary judgment order and outline issues/claims for trial (3.0); begin strategizing re: witnesses and exhibits (1.6).	BW	4.60	1,035.00	PJH
	Created chart and searched client file re: deposition exhibits needed.	BW	1.00	62.50	MMM
Feb-14-23	Legal research re: admissibility of treating physician opinions under Rule 701 (1.6); review treatment notes and strategize re: admission of same at trial (2.8).	BW	4.40	990.00	PJH
Feb-16-23	Attention to logistics for production of witnesses at trial and email to opposing counsel re: same.	BW	0.30	67.50	PJH
Feb-17-23	Begin drafting outline for	BW	4.60	1,035.00	PJH

	pretrial disclosures and review of documents/depositions in connection with same.				
	Telephone call with P. Hannon re: exhibit lists (.2); email P. Summergrad re: trial schedule (.1); email Datamine representatives re: activation of review site (.1).	BW	0.40	65.00	HW
Feb-22-23	Emailing with K. Wexelblatt re: settlement discussions; confer with P. Hannon.	BW	0.40	90.00	HJH
	Review of Defendant's ESI for inclusion in exhibit list.	BW	5.20	1,170.00	PJH
	Review of Plaintiff's document production for inclusion in exhibit list.	BW	3.00	487.50	HW
Feb-23-23	Telephone conference with P. Hannon re: settlement issues; prepared for and conducted additional discussions re: settlement parameters with K. Wexelblatt.	BW	0.60	135.00	HJH
	Continued review of Defendant's ESI for inclusion in exhibit list.	BW	4.20	945.00	PJH
	Review of securities filings and client files re: equity losses (3.0); legal research re: same (2.0); preparation of Exhibit List re: documents concerning damages and emotional distress (6.3).	BW	11.30	1,836.25	HW
Feb-24-23	Draft and serve pretrial disclosures (1.4); complete review of Defendant's ESI production for trial exhibits (3.2); review and revise deposition designations for M.	BW	6.40	1,440.00	PJH



	Menninger (.4); review deposition transcript of H. Mekerii and identify designations for trial (3.4).				
	Further review of documents for Exhibit List including review of materials from expert witnesses, Motion to Compel, and Summary Judgment for potential inclusion (5.8); review deposition transcript of M. Menninger to mark pages for designation (2.9); email and telephone correspondence with P. Hannon re: preparation of Exhibit List and exhibits for trial (.6).	BW	9.30	1,511.25	HW
Feb-25-23	Initial review of Defendant's pretrial disclosures (1.0); attention to possible trial themes and email to H. Watson re: same (.6).	BW	1.60	360.00	PJH
Feb-27-23	Attention to trial preparation deadlines and strategy.	BW	0.40	90.00	PJH
	Attention to preparing exhibits for trial.	BW	3.20	1,040.00	AWS
	Preparation of exhibit files from Plaintiff and Defendant's pretrial exhibit disclosures (4.0); email correspondence with M. Michon and A. Smith re: same (.3); telephone call with P. Hannon re: same (.4).	BW	4.70	763.75	HW
Feb-28-23	Attention to exhibit preparation (.2); email to H. Watson re: same (.1); attention to email from opposing counsel requesting supplemental production of documents re: SSI (.2).	BW	0.50	112.50	PJH

Attention to exhibits.	BW	1.10	357.50	AWS
Attention to preparation of exhibit files for Defendant and Plaintiff's exhibits (1.9); review summary judgment papers and expert reports in preparation for potential drafting of Motions in Limine (3.6); email correspondence with L. Menninger re: supplementation of tax and Social Security files (.4).	BW	5.90	958.75	HW
Totals		73.20	\$14,568.75	

HJH	Total Hrs Billed 1.00	Rate \$225.00	Total Fees \$225.00
PJH	Total Hrs Billed 32.20	Rate \$225.00	Total Fees \$7,245.00
AWS	Total Hrs Billed 4.30	Rate \$325.00	Total Fees \$1,397.50
HW	Total Hrs Billed 34.70	Rate \$162.50	Total Fees \$5,638.75
MMM	Total Hrs Billed 1.00	Rate \$62.50	Total Fees \$62.50

**DISBURSEMENTS** (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Feb-28-23	Hosted Data and Project Management	590.00
Totals		\$590.00

<b>Total Fee &amp; Disbursements</b>	<b>\$15,158.75</b>
Trust Transferred at Billing	15,158.75
Previous Balance	3,051.25
Previous Payments	3,051.25
<b>Balance Now Due</b>	<b>\$0.00</b>

Please Replenish Retainer Balance \_\_\_\_\_

TAX ID Number 13-4299300

**PAYMENT DETAILS**

Feb-17-23		3,051.25
Apr-05-23	Payment for invoice: 34683	15,158.75
		<hr/>
	<b>Total Payments</b>	<b>\$18,210.00</b>

**TRUST STATEMENT**

		<b>Disbursements</b>	<b>Receipts</b>
Mar-31-23	Received From: Lisa Menninger Retainer replenishment		25,000.00
Apr-05-23	Paid To: Hartley Michon Robb Hannon LLP Payment for invoice: 34683	15,158.75	
	Total Trust	<hr/> \$15,158.75	<hr/> \$25,000.00
	<b>Trust Balance</b>		<b>\$9,841.25</b>

***Hartley Michon Robb Hannon LLP***155 Seaport Blvd., 2nd Floor  
Boston, MA 02210-2698

Ph: 617-723-8000

Fax: 617-447-2800

Lisa Menninger  
9495 NW Ember Lane  
Portland, OR  
97229

April 13, 2023

**Attention:**

File #: 43121-003

Inv #: 34761

**RE:** Litigation - Pharmaceutical Product Development

DATE	DESCRIPTION		HOURS	AMOUNT	LAWYER
Mar-01-23	Preparation of Plaintiff's exhibits for trial (1.5); email P. Hannon re: potential motions in limine (2.2); prepare supplemental production of tax and Social Security records (1.0); email correspondence with L. Menninger re: same (.4).	BW	5.10	828.75	HW
	Organized and converted client exhibit files per H. Watson's instruction.	BW	1.00	62.50	MMM
Mar-02-23	Draft and serve objections to Defendant's pretrial disclosures.	BW	3.60	810.00	PJH
	Preparation of Plaintiff's trial exhibits (2.2); email opposing counsel re: clarification of certain exhibits (.4); email P. Hannon re: exhibits, Defendant's objections, and next steps (.7).	BW	3.30	536.25	HW
	Continued to organize and	BW	1.40	87.50	MMM

convert client exhibit files per H. Watson's instruction.

Mar-03-23	Legal research re: legal standards for failure to accommodate claim.	BW	1.80	292.50	HW
Mar-06-23	Confer with H. Watson re: trial preparation and strategy.	BW	1.20	270.00	PJH
	Telephone call with P. Hannon re: preparation for trial (1.2); email correspondence with P. Summergrad, L. Menninger, and B. Jonas re: trial preparation (.8); telephone call with B. Jonas re: same (.1); legal research and prewriting for Motion in Limine re: voluntary disability disclosure form (3.2).	BW	5.30	861.25	HW
Mar-07-23	Confer with counsel for Dr. K re: trial logistics and scheduling (.3); review summary judgment order and stratgeize re: framing issues for jury (3.4); attention to exhibits (1.2).	BW	4.90	1,102.50	PJH
	Email correspondence with P. Summergrad and B. Jonas and assistant D. Lane re: preparation for trial.	BW	0.90	146.25	HW
Mar-08-23	Draft list of topics for jury charges (2.0); draft Motion in Limine re: voluntary disclosure of disability form (1.0); review expert reports of M. Kelly for potential Motion in Limine topic (2.5); telephone call with P. Hannon re: next steps (.4).	BW	5.90	958.75	HW
Mar-09-23	Confer with client re: trial logistics and strategy (.7); draft pretrial memo (2.1); emails	BW	5.00	1,125.00	PJH

to/from opposing counsel re:  
same (.3); draft proposed joint  
statement for jury (1.1); emails  
to/from H. Watson re: trial  
strategy and framing of claims  
(.8)

Draft Motions in Limine re: Dr. Kelly testimony (8.2), Voluntary Self-Identification Form (4.3).	BW	12.50	2,031.25	HW
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Mar-10-23	Revise and finalize proposed jury instructions (4.7); revise and finalize proposed voir dire questions (.5); revise and finalize verdict slip (.3); revise and finalize MIL re: Dr. Kelly (.4); meet and confer with opposing counsel re: MILs (.2)	BW	6.10	1,372.50	PJH
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Revise, proofread, and file Motions in Limine re: Dr. Kelly testimony and Voluntary Self-Identification Form (.5); drafting and review of draft jury instructions (6.1); draft and revise proposed verdict slip (1.1); draft proposed voir dire questions (2.8); telephone calls with P. Hannon re: same (.7).	BW	11.20	1,820.00	HW
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Researched recent verdicts in cases with failure to accommodate disability and retaliation claims for H. Watson.	BW	0.20	12.50	MMM
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Mar-13-23	Confer with P. Summergrad and H. Watson re: testimony preparation and logistics (2.5); review expert reports in preparation for same (2.3); revise and finalize pretrial memo (2.1); emails to/from opposing counsel re: same (.6).	BW	7.50	1,687.50	PJH
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	Assistance with exhibit list to be filed with Joint Pretrial Memorandum (2.3); meeting for trial preparation with P. Summergrad (2.5); drafting of Opposition to Defendant's Motion in Limine re: documents recently disclosed (2.1).	BW	6.90	1,121.25	HW
Mar-14-23	Revise and file opposition re: stray remarks MIL (2.2); draft and file motion to seal re: same (.3); emails to/from opposing counsel re: same (.2); revise opposition to employee comp MIL (.6); confer with H. Watson re: same (.2); draft and finalize opposition to MIL re: employee relationship (1.2); draft and file opposition to MIL re: dismissed claims (2.4); draft and file opposition to MIL re: accommodations not requested (2.6).	BW	9.70	2,182.50	PJH
	Draft Oppositions to Motions in Limine to Exclude Evidence of Documents Produced on Feb. 24, 2023 (5.7) and to Exclude Evidence of Compensation of Other Employees (4.0).	BW	9.70	1,576.25	HW
Mar-15-23	Review oppositions to Plaintiff's Motions in Limine (1.6); prepare talking points for P. Hannon re: measure of damages and Plaintiff's Motions in Limine for Final Pretrial Conference (1.2).	BW	2.80	455.00	HW
Mar-16-23	Attend pretrial conference (3.1); prepare for same (3.7); confer with T. Hart re: trial logistics (.3); emails to/from client re: same (.4).	BW	7.50	1,687.50	PJH



	Attend Final Pretrial Conference (3.1); preparation for same (2.8); prepare documents for pretrial preparation for P. Summergrand and email P. Summergrad re: same (3.9).	BW	9.80	1,592.50	HW
Mar-17-23	Review/revise exhibit list (4.0); emails to/from opposing counsel re: same and "family" exhibits (.5); attention to order on motions in limine (.3); confer with client re: same (.3); confer with H. Watson and B. Jonas re: testimony preparation and scheduling (.6); prepare for same (.4); review/analyze deposition of D. Ballweg (3.2).	BW	9.30	2,092.50	PJH
	Review and analyze proposed jury instructions of parties for potential issues to separately instruct under federal and state law (1.5); legal research re: issues implicated by jury instructions and potential differences between federal and Massachusetts law (2.3); email memorandum re: same to P. Hannon (.8).	BW	4.60	747.50	HW
Mar-18-23	Review/analyze deposition of L. Menninger (3.5); review/analyze deposition transcript of P. Summergrad (2.2); strategize re: case theory/theme and evidence presentation (3.3).	BW	9.00	2,025.00	PJH
Mar-19-23	Draft/revise Menninger direct (6.2) and opening statement (3.5); review exhibits in preparation for trial (2.4).	BW	12.10	2,722.50	PJH
	Trial preparation meeting with	BW	6.30	1,023.75	HW

L. Menninger and P. Hannon (3.4); prepare supplemental jury instruction and companies list for voir dire (2.9).

Mar-20-23	Prepare for day 1 of trial, including opening, jury selection and examination of Menninger (2); attend day 1 of trial (8); prepare for day 2 of trial, including examination of Menninger (2.2).	BW	12.20	2,745.00	PJH
	Run exhibits over to courthouse; observe trial.	NC	1.50	N/C	AWS
	Telephone call with P. Hannon re: supplemental jury instruction (.2); revise and file same on docket (.3); attend jury trial day 1 (8.0); conference with P. Hannon and L. Menninger re: preparation for continued direct examination (.2); conference with P. Hannon re: debrief of trial day 1 (.2); email correspondence with P. Summergrad re: second preparation session and testimony timing (.2); telephone call with B. Jonas re: travel schedule (.2).	BW	9.30	1,511.25	HW
	Gathered and brought materials to courthouse for H. Watson and P. Hannon.	BW	0.40	25.00	MMM
Mar-21-23	Prepare for day 2 of trial, including examination of Menninger (1.5); attend day 2 of trial (4.5); prepare for day 3 of trial, including examinations of Menninger and Ballweg (3.8)	BW	9.80	2,205.00	PJH
	Observe trial.	NC	2.10	N/C	AWS

	Prepare direct examination outline for P. Summergrad (6.7); email and telephone correspondence with P. Summergrad and B. Jonas re: timing of testimony (.3); legal research re: hearsay exceptions and draft memo re: same (1.5).	BW	8.50	1,381.25	HW
	Conducted a timed read-through of Hacene Mekerri's 2020 deposition transcript in preparation for jury trial.	BW	1.60	100.00	MMM
Mar-22-23	Prepare for day 3 of trial, including examinations of Menninger and Ballweg (.7); attend day 3 of trial (4.5); prepare for day 4 of trial, including examinations of Menninger and Ballweg (4.8)	BW	10.00	2,250.00	PJH
	Attend and assist with trial day 3 (4.5); conference with P. Hannon and L. Menninger after same (.2); email correspondence with M. Michon re: preparation of transcript for reading at trial of H. Mekerri deposition (.2); prep session videoconference with P. Summergrad (.5); research additional past testimony of defense medical expert M. Kelly and request transcripts of same from Supreme Judicial Court clerk (4.0); email correspondence with T. Hart re: trial prep session (.2).	BW	9.60	1,560.00	HW
	Combined and edited both Plaintiff and Defendant's specified portions of Hacene Maekerri's 2020 deposition transcript for jury trial. Sent same to opposing counsel.	BW	5.50	343.75	MMM

Mar-23-23	Prepare for day 4 of trial, including examinations of Menninger and Ballweg (.5); attend day 4 of trial (4.4); prepare for day 5 of trial, including examinations of Ballweg and Hart (2.2)	BW	7.10	1,597.50	PJH
	Interview and preparation session with T. Hart (2.2); email outline of topics for direct examination of T. Hart (.5); review T. Hart deposition transcript and email P. Hannon re: comments from same (.4); conference with P. Hannon re: debrief of trial day 4 (.3); email correspondence with Supreme Judicial Court clerk's office re: trial transcripts with testimony of M. Kelly (.2).	BW	3.60	585.00	HW
Mar-24-23	Prepare for day 5 of trial, including examinations of Hart and Ballweg (.7); attend day 5 of trial (4.6).	BW	5.30	1,192.50	PJH
	Attend and assist with Day 5 of trial (4.6); email correspondence with P. Summergrad re: review packet (.3); review potential exhibits for use in continued examination of D. Ballweg and email P. Hannon re: same (1.1).	BW	6.00	975.00	HW
	Created and organized exhibit binders for jury trial.	BW	4.00	250.00	MMM
Mar-26-23	Prepare for day 6 of trial, including examinations of Summergrad, Kessimian and Ballweg.	BW	8.40	1,890.00	PJH

	Email correspondence with L. Menninger re: factual follow-up (.2); review of deposition and trial testimony of M. Kelly in preparation for drafting of outline of cross examination (2.9); initial outlining of cross examination (1.0).	BW	4.10	666.25	HW
Mar-27-23	Prepare for day 6 of trial, including examinations of Ballweg, Kessimian and Summergrad (.5); attend day 6 of trial (8.1); prepare for day 9 of trial, including examinations of Fikry and St John (4.5).	BW	13.40	3,015.00	PJH
	Observe trial; take notes re: specific jury members.	NC	4.00	N/C	AWS
	Attendance and assistance at Trial day 6 (5.0); conference with P. Hannon re: debrief from same and next steps (.2); prepare supplemental jury instruction and file same (2.8); email and telephone correspondence with B. Jonas re: travel and testimony logistics (.2).	BW	8.20	1,332.50	HW
	Gathered and brought materials to courthouse for H. Watson and P. Hannon; prepared for potential read-through of Hacene Mekerri's 2020 deposition transcript for the jury.	BW	1.40	87.50	MMM
Mar-28-23	Prepare for day 7 of trial, including examinations of Fikry and St John (1.8); attend day 7 of trial (8.2); prepare for day 8 of trial, including	BW	12.40	2,790.00	PJH

examinations of McKinnon and Clendening (2.4).

Prepare outline of cross examination of M. Kelly (4.0); review of documents and background research re: prior testimony for same (1.5); attend afternoon of trial day 7 and read deposition testimony of M. Menninger (4.0).	BW	9.50	1,543.75	HW
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Assisted with trial at the courthouse re: a read-through of Hacene Mekerri's 2020 deposition transcript for the jury.	BW	4.30	268.75	MMM
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Mar-29-23	Prepare for day 8 of trial, including examinations of McKinon and Clendenning (.9); attend day 8 of trial (3.9); prepare for day 9 of trial, including examinations of Kelly and Jonas, and charge conference (7.6).	BW	12.40	2,790.00	PJH
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Attendance at trial day 8 and read deposition testimony of M. Menninger at same (3.9); conference with P. Hannon re: debrief from trial day 8 (.3); preparation meeting with B. Jonas (.2); legal research re: permissible damages arguments at closing argument and email memorandum of research re: same to P. Hannon (2.5); review draft Jury Instructions from Court (.9); legal research re: same (1.0); prepare list of issues to raise at Charge Conference (2.0); conference with P. Hannon re: next steps for review of jury instructions (.3).	BW	11.10	1,803.75	HW
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	Gathered and brought materials to courthouse for H. Watson and P. Hannon.	BW	0.40	25.00	MMM
Mar-30-23	Prepare for day 9 of trial, including charge conference and examinations of Jonas and Kelly (2.1); attend day 9 of trial (6.1); prepare for day 10 of trial, including closing argument (4.7).	BW	12.90	2,902.50	PJH
	Assist H. Watson with printing and assembling jury materials.	NC	0.30	N/C	AWS
	Prepare bench memorandum, suggested revisions to Court's draft jury instructions, and exhibits for presentation at Charge Conference (2.1); attend trial day 9 and Charge Conference (6.1); review draft exhibits for jury's exhibit disc provided by opposing counsel (.6); prepare additional uncontested exhibit files for inclusion in exhibit disc (.6); review and confirm accuracy of exhibits to be included in disc (.6).	BW	10.00	1,625.00	HW
Mar-31-23	Attend final day of trial (6.8); prepare for closing argument (1.2).	BW	8.00	1,800.00	PJH
	Observe trial.	NC	2.70	N/C	AWS
	Attendance at trial day 10 and prepare final exhibit list with descriptive titles for jury review.	BW	6.80	1,105.00	HW
	Totals		391.40	\$71,597.50	

PJH	Total Hrs Billed	187.80	Rate	\$225.00	Total Fees	\$42,255.00
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A W S	Total Hrs Billed	10.60	Rate	\$0.00	Total Fees	\$0.00
H W	Total Hrs Billed	172.80	Rate	\$162.50	Total Fees	\$28,080.00
M M M	Total Hrs Billed	20.20	Rate	\$62.50	Total Fees	\$1,262.50

**DISBURSEMENTS**
 (Please be advised that expenses incurred, but not yet received, will follow with firm's next billing cycle.)

Mar-23-23	Parking Mar 2023 PJH	76.00
Mar-31-23	Hosted Data	200.00
	Totals	\$276.00
	<b>Total Fee &amp; Disbursements</b>	<b>\$71,873.50</b>
	<b>Balance Now Due</b>	<b>\$71,873.50</b>

TAX ID Number 13-4299300